

DATA COVERED BY THIS PRIVACY STATEMENT

This Privacy Statement describes the privacy practices of the SGR Marketing Limited for data that we collect:

- through websites operated by us from which you are accessing this Privacy Statement, owned or controlled by the SGR Marketing Limited (collectively, the Websites);
 - through the software applications made available by us for use on or through computers and mobile devices (the Apps);
 - through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our Social Media Pages);
 - through email messages that we send you that link to this Privacy Statement and through your communications with us online or in person;
 - from third parties such as public databases, marketing partners and other third parties; and
 - when you visit or stay as a guest at one of our events, or through other offline interactions.
- Collectively, we refer to the Websites, the Apps, and our Social Media Pages, as the “Online Services” and, together with the Event Visits and Offline Interactions, the “Services.”

THE DATA WE COLLECT

At touchpoints throughout your journey, we collect Personal Data in accordance with the law, and to serve you better. Personal Data is information that may identify you as an individual or relate to you as an identifiable individual. We collect and process the following types of Personal Data about you:

- Name
- Gender
- Postal address
- Telephone number
- Email address
- Financial information (such as bank account details or other payment data)
- Language preference
- Date and place of birth
- Nationality, passport, visa, or other government-issued identification data
- Employer details (for business-related bookings)
- Travel itinerary, tour group, or activity data

In more limited circumstances, we may also collect:

- Data about family members and companions, names, and ages of children
- Biometric data
- Images, video and audio data via: (a) cameras located in public areas, such as hallways and lobbies; and (b) cameras carried by our event personnel

We may also collect information about your Preferences that we use to make your experience with us more enjoyable, including information about your interests and other relevant information that we learn about you during your stay. This may also include any likes and dislikes about our Services that you tell us about so that we can improve our Services, and specific dietary, health restrictions or personal needs to ensure your wellbeing.

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

COOKIES AND OTHER DATA

We may also collect “Other Data” that generally does not reveal your specific identity or does not directly relate to an identified individual. To the extent Other Data reveals your specific identity or relates to an individual, we will treat Other Data as Personal Data. Other Data includes:

- Your browser or device
 - We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Apple), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this data to ensure that the Online Services function properly.
- Your use of the Apps
 - We collect certain data when you download and use an App, such as App usage data, the date and time the App on your device accesses our servers, and what data and files have been downloaded to the App based on your device number. We use this data to ensure that the Online Services function properly. Our Apps may contain software development kits (SDKs) from third parties which may collect and transmit Other Data to enable various features in the App.
- Optional App Features
 - Our Apps may contain optional features made available to developers by the device’s operating system. To improve your experience, we may require your permission for the use of your device’s location, camera, or other functions (e.g. using your device’s camera to capture your driving license). You may choose not to allow the use of such functions, in which case the App features relying on such functions may not be available to you. Go to your device’s settings to manage these permissions.
- Cookies
 - We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies allow us to collect browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We use functional cookies to obtain the data for security purposes, to facilitate navigation, to display content more effectively, to collect statistical data, to personalize your experience while using the Online Services, and to recognize your computer to assist your use of the Online Services.

We also gather statistical cookie data about use of the Online Services to continually improve design and functionality, understand how they are used and assist us with resolving questions. Advertising cookies further allow us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Online Services. We also use them to send marketing emails and to track responses to online advertisements and marketing emails. You can learn more about cookies at: <http://www.allaboutcookies.org/manage-cookies/index.html>

Manage Cookie Preferences:

You can choose whether to accept cookies by managing your tracking preferences by rejecting cookies by changing the settings on your browser. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognise your device. At this time, we do not respond to browser “Do-Not-Track” signals.

- Pixel Tags and other similar technologies

- We collect data from pixel tags (also known as web beacons and clear GIFs), which are used with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Online Services.
- Analytics
 - We collect data through Google Analytics, which uses cookies and technologies to collect and analyse data about use of the Services. These Services collect data regarding the use of other websites, apps, and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/ and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>
- Your IP Address
 - We collect your IP address, a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.
- Aggregated and Segmented Data
 - We may aggregate data that we collect, and this aggregated data will not personally identify you or any other user. We may also use both Personal Data and Other Data to divide customers into segments, or groups, in order to provide more relevant experiences.
- Precise Location-Based Services
 - With your consent, we may collect the precise physical location of your device by using satellite, Wi-Fi signals, or other technologies. We will collect this data if you opt-in through the App or other relevant program to enable location-driven capabilities on your device. If you have opted-in to share your location, the App or other program will continue to collect location data based on how you chose to share the data.
 - You can opt out of Precise Location-Based Services. You can specify via the device’s operating system to always share location, only when the App is in use, or never. If you choose only when the App is in use, we will have access to the data until you log off or close the application or if you use your phone’s or other device’s settings to disable location capabilities for the App or other program.

HOW AND WHERE WE COLLECT YOUR DATA

This Privacy Statement describes the privacy practices of the SGR Marketing Limited for Personal and Other Data that we collect through the following:

SGR Marketing Limited

We collect Personal Data and Other Data for the purposes described in this Privacy Statement, such as providing and personalising the Services, communicating with you, facilitating event programs and to accomplish our business purposes.

Clients

We collect Personal Data and Other Data from companies when we enter into an agreement to provide goods and services. This data will be specific to the agreement and the requirements to fulfil the agreement.

Linked Data

We collect Personal Data and Other Data when you use our Service, App or other programs. This data can be used to personalise the provision of services and experiences, e.g. Disability requirements for an event run by a separate client. When you enrol in those services, we disclose your Personal Data and Other Data to those third parties where necessary or appropriate to the fulfilment of the agreement. If you do not want us to collect your Personal Data or Other Data in this way, please contact dpo@sgrmarketing.co.uk

Other Sources & Service Providers

We collect Personal Data and Other Data from various third parties, such as public databases or joint marketing partners.

Online Services

We collect Personal or Other Data when you interact with our Online Services, by performing such actions as, but not limited to, browsing, making a reservation, communicating with us or otherwise connecting with us or posting to social media pages, or signing up for a newsletter.

WHY WE COLLECT YOUR DATA (LEGAL BASIS)

Conferences & Events

There are a number of activities associated with this purpose, such as: communicating with customers about conferences and other event planning (“Events”); facilitating reservation and bookings of Events; engaging in pre Event communications (logistics, accommodations, changes, etc.); preparing for and coordinating Events in accordance with customer instructions, expectations and preferences; facilitating catering; communicating about billing and recovering amounts owed; processing payments and security deposits; performing credit checks; handling customer requests, inquiries and complaints; and communicating with participants during Events.

Performance of contract, such as collecting information regarding a planned Event or processing payments.

Legitimate interests, such as responding to complaints or concerns relating to an Event, honouring your preferences (e.g., for a room near the elevator or on a top floor) as well as for any individuals accompanying you (e.g., spouse, children, friends).

Consent, such as collecting information regarding dietary preferences that you choose to provide.

Legal obligations relating to financial transactions, such as the obligation to maintain books and records or collecting national ID numbers where legally required.

General Business Operations

There are a number of activities associated with this purpose, such as: administering customer care services to facilitate and address inquiries, comments and complaints (such as in person, through phone lines or email); handling security and fraud prevention; administering online services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and the hosting of data); monitoring and analysing usage of services and using data analytics to improve services, marketing, programs, overall customer experience, gathering feedback, developing new and improving existing services.

Performance of contract, such as ensuring that online services are functioning so that individuals can manage their Event or experience.

Legitimate interests, such as responding to customer complaints and concerns which may include, where applicable law permits, recording customer service call or storing emails.

Consent, such as for marketing programs.

Legal obligations relating to financial transactions, such as the obligation to maintain books and records.

Emergency & Incident Response

There are a number of activities associated with this purpose, such as: ensuring the security of on-site services; responding to, handling and documenting on-site accidents and medical and other emergencies; requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via SMS, email, call, audio-visual device prompts, etc.).

Performance of contract, such as ensuring the safety of you and personnel through interactions with on-site Event management and support personnel.

Legitimate interests, such as sharing disclosed medical information to emergency services.

Legal obligations, such as documenting on-site accidents.

Individuals' vital interests, such as contacting medical or emergency services.

Legal & Compliance

There are a number of activities associated with this purpose, such as: complying with applicable laws; complying with legal processes; responding to requests from public and government authorities; meeting law enforcement requirements; enforcing our terms and conditions; protecting our operations; protecting the rights, privacy, safety, or property of the SGR Marketing Limited, clients, guests, visitors and other relevant individuals; and allowing us to pursue available legal remedies and limiting the damages that SGR Marketing Limited may sustain.

Legal obligations, such as complying with legal processes.

Legitimate interests, such as enforcing terms and conditions to protect trademarks.

Individuals' vital interests, such as contacting emergency services in case of disturbances and incidents.

Additional Client or Guest Services

There are a number of activities associated with this purpose, such as: facilitating reservations and bookings; determining eligibility for services; honouring disability or other health-related restrictions and providing appropriate and safe services; providing consistent and personalised service based on past usage and preferences expressed by the individual; processing payments; arranging requested professionals for specific services; and handling customer requests, inquiries and complaints.

Performance of contract, such as processing payments.

Consent, such as collecting information about back problems when arranging services that require guests to be physically active.

Legitimate interests, such as providing personalised services (e.g., offering experiences based on past activity).

Legal obligations relating to financial transactions, such as the obligation to maintain books and records.

Individuals' vital interests, e.g., when an individual suffers injury while using on site equipment.

Food & Beverage Services

There are a number of activities associated with this purpose, such as: facilitating reservations; honouring dietary preferences; providing consistent and personalised service based on past usage and preferences expressed by the individual; processing payments; arranging reservations; and handling customer requests, inquiries, and complaints.

Performance of contract, such as processing payments.

Consent, such as collecting information about dietary, health restrictions, or personal needs when ordering food.

Legitimate interests, such as providing personalised services (e.g., offering red wine based on previous requests).

Legal obligations relating to financial transactions, such as the obligation to maintain books and records.

Individuals' vital interests, e.g., when an individual becomes ill in at a dinner event.

Accounts, & Relationship Management

There are a number of activities associated with this purpose, such as: registering users in delegate management and other client account programs; determining eligibility for related services; providing consistent and personalised service based on past usage and the preferences expressed by guests; ensuring access to Online Services; notifying members about changes to programs, terms and conditions; and handling members' requests, inquiries and complaints.

Performance of contract, such as confirming room reservations and allocating rooms.

Consent, such as honouring the mode of communication preferences (e.g., email, SMS)

Legitimate interests, such as managing members' data to enable the appropriate Event experiences.

Legal obligations relating to financial transactions such as the obligation to maintain books and records

Marketing, Promotions, Contests & Third Party Products

There are a number of activities associated with this purpose, such as: communicating about products and services that may be of interest to clients and guests; facilitating participation in competition and other promotions and handling customer requests, inquiries and complaints.

Performance of a contract, such as fulfilling obligations associated with a competition.

Consent, such as honouring the mode of communication preferences (e.g., email, SMS).

Legitimate interests, such as providing advertisements for similar products and services to clients.

Legal obligations, such as handling information consistent with rules relating to competitions.

MORE INFORMATION ABOUT PERSONAL PREFERENCES

Our goal is to provide outstanding events and experiences for our clients and their guests, from initial enquiry through to the last person leaving an event. See below to learn more.

Activity types, bookings and preferences

We want to ensure that we provide the services that meet or exceeds client and guest expectations. To do this, we may retain your preferences about the types of activities that are requested, booked or taken part in, so that we can ensure we are able to offer similar experiences in the fulfilment of future agreements.

Consent, where applicable

Relationships (husband, wife, son, daughter, host)

We understand that your preferences may change depending on who you are visiting and the nature of the relationship between clients and guests. We may keep a record of relationships to assist with making Event experiences as positive as possible. For example, if we know a client or guest is bringing a spouse, we can proactively request the appropriate accommodation.

Legitimate interest, in order to provide clients and guests with exceptional service

Consent, where applicable

Dietary preferences

When we arrange dining as part of an Event we want to ensure that you are safe, that we are looking after your wellbeing, and able to provide services to enhance the Event experience. For example, we may make a note of dining preferences so that we are prepared and can provide the appropriate meals.

Legitimate interest, in order to provide you with exceptional service

Consent, where applicable

HOW AND WHEN WE SHARE YOUR DATA

Our goal is to provide you with the highest level of Service, and to do so, we may share Personal Data and Other Data with the following:

SGR Marketing Limited.

We within SGR Marketing Limited for the purposes described in this Privacy Statement, such as providing and personalising the Services, communicating with clients and guests, facilitating or cancelling experiences and to accomplish our business purposes. We share your Personal Data and Other Data used for making reservations with other service providers in order to fulfil agreements.

Clients.

We disclose Personal Data and Other Data to Clients when requested including, for example, contact email addresses, phone numbers, additional services booked. This will be specific to the agreement and the requirements to fulfil the agreement.

Linked Data.

We sometimes work with clients and partners that work in similar industries and occasionally you and/or your guests would be present at events hosted by different clients. Any data collected may be passed on to our client, meaning that preferences collected relating to a client event may be passed on to a different client where you have been/will be present at both e.g., you request to have a ground floor room at an event for Client A, then are assigned a ground floor room at an event for Client B based on our previously collected data. If you do not want us to use Personal Data or Other Data in this way, please contact dpo@pebble-events.com

Service Providers.

We disclose Personal Data and Other Data to third party service providers including, for example, companies that provide event management software services, website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, and other services.

Other Uses and Disclosures:

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of SGR Marketing Limited, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose relating to the fulfilment of an agreement, except where we are not allowed to under applicable law.

YOUR DATA, YOUR CHOICES: YOUR PRIVACY PREFERENCES & RIGHTS

We believe that you should have choices with respect to your data. We provide you with the options, information, and choices below to express your preferences: what and how much you share with us and when and how you hear from us.

- Communications and Preferences
 - You can use the unsubscribe link at the bottom of any of our communications. Even if you choose to opt out of marketing-related emails, we will continue to send you transactional messages, such as information about your Events.
- Cookies and Other Data
 - For information on your choices related to Cookies and Other Data, please see the Section on Cookies and Other Data, above.
- How You Can Request to Access, Change, Delete, Restrict the Use or Object to the Processing of Your Personal Data

- If you would like to request to access, change, delete, restrict the use of, or object to the processing of your Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent these rights are provided to you by law), please contact dpo@sgrmarketing.co.uk
- For your protection, we only fulfil requests for the Personal Data associated with the email address that you identify in your request, and we may need to verify your identity before fulfilling certain requests.
- When permitted by law, we may charge an appropriate fee to cover the costs of responding to your request.

SGR Marketing Limited acknowledges and respects the privacy of our clients and delegates privacy and we will try to comply with your request as soon as reasonably practicable and consistent with applicable law.

OTHER IMPORTANT PROVISIONS

Non-SGR Marketing Limited Entities

This Privacy Statement does not address, and we are not responsible for the privacy, data, or other practices of any entities outside of the SGR Marketing Limited, including Hotels, Property Management Companies, Strategic Business Partners, or any third party operating any site or service to which the Services link. We generally have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data.

In addition, we are not responsible for the data collection, use, disclosure, or security policies or practices of other organisations, such as Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider or device manufacturer, including with respect to any Personal Data you disclose to other organisations through or the Apps or our social media pages.

Security

We seek to use reasonable organisational, technical, and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us at dpo@sgrmarketing.co.uk

Retention

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you/the associated Client and provide the Services
- Whether there is a legal obligation to which we are subject (for example, certain laws can require us to keep records of transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations)
- Sensitive Data

- Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).

Use of Services by Minors

The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services. If data relating to minors is required during the fulfilment of an agreement then the appropriate local data protection regulations and laws regarding data relating to minors would be adhered to.

International Data Transfers

SGR Marketing Limited provides a global service. Transferring data internationally is essential to the Services so that we can provide the Services in accordance with any agreement. As a result, we will, subject to law, transfer Personal Data and Other Data collected in connection with the Services, to entities in countries where data protection standards may differ from those in the country where you reside, including outside the EEA, UK, or Switzerland. By providing data to SGR Marketing Limited you understand that we transfer your Personal Data globally.

In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data.

Some of the countries are recognized by the UK and the European Commission as providing an adequate level of data protection according to EEA. SGR Marketing Limited enters into Standard Contractual Clauses or another approved mechanism for cross-border transfer where appropriate.

Updates to This Privacy Statement

The "Last Updated date" listed indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Online Services. If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at dpo@sgrmarketing.co.uk.

Contact Us

If you have any questions about this Privacy Statement, please contact us at dpo@sgrmarketing.co.uk

ADDITIONAL INFORMATION

Data Controller/Processor status

SGR Marketing Limited acts as a data processor in relation to data submitted to us in the fulfilment of an agreement to provide Services. Any data collected by SGR Marketing Limited will be subject to the specifications made in this policy.

SGR Marketing Limited acts as a data controller in relation to the data that is collected by SGR Marketing Limited for its own business purposes.

As independent controllers, we do not propose to amend our contractual arrangements with you at this time. However, in-line with our obligations under GDPR, we are taking steps to ensure that we:

- Process personal data fairly, transparently and on lawful grounds
- Process personal data only for the purpose for which it was collected
- Ensure that the personal data is adequate, relevant and limited to what is necessary
- Implement appropriate technical, organisational and security measures
- Practice data protection by design and default
- Ensure personal data is adequately protected if it is transferred to destinations outside the UK
- Only share personal data where we need to and have included this information in our Privacy Notice
- Retain personal data only for as long as is necessary
- Honour individuals' rights

You can also:

Contact our data protection officer at dpo@sgrmarketing.co.uk.

If you wish to lodge a complaint regarding an alleged infringement of applicable data protection law with the UK please visit <https://ico.org.uk/make-a-complaint/>.

For the EEA, a list of the national data protection authorities can be found at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.