

## **SECRET THEATRE PRIVACY POLICY**

### **1. INTRODUCTION**

- 1.1. This privacy notice ("Privacy Notice") sets out the ways in which we, Secret Theatre Limited ("Secret Theatre", "we", "us", "our"), collect and use your personal data in connection with our business. It also explains what rights you have to access or change your personal data.
- 1.2. Our website and services are not intended for children. We do not knowingly collect or maintain the personal data of children under the age of 18. If you are under the age of 18, please do not attend our events or access our website at any time or in any manner. We will take appropriate steps to delete the personal data of persons under the age of 18.

### **2. ABOUT US**

- 2.1. We are Secret Theatre Limited, a company registered in England under company number 12640809, with our registered address at 46a Rosebery Avenue, London, United Kingdom, EC1R 4RP.
- 2.2. We are part of the DesignScene Group of companies, including DesignScene Limited, a company registered in England under company number 05655312, with our registered address at Designscene, Gensurco House, 3rd Floor, 46a Rosebery Avenue, London, EC1R 4RP.
- 2.3. You can contact us by writing to our address as provided above, or you can email at [mail@secret.theatre](mailto:mail@secret.theatre)

### **3. INFORMATION WE MAY COLLECT ABOUT YOU**

- 3.1. Information that you provide to us.
  - 3.1.1. We will collect any information that you provide to us when you:
    - (a) submit correspondence, make an enquiry, provide feedback or make a complaint over the phone, by email or by post;
    - (b) meet with us in person;
    - (c) register to and/or attend our events (including in connection with the purchase of tickets for any such event);
    - (d) submit a CV, a submission or request to work with us, an application to a job vacancy, or attend an interview or assessment; and
    - (e) 'follow', 'like', post to or interact with our social media accounts or other forums, including Facebook, LinkedIn, X, Pinterest, Instagram, Google+, Snapchat, Vimeo, Creative and Behance.
  - 3.1.2. The information you provide to us will include (depending on the circumstances):
    - (a) Identity and contact data: title, names, addresses, email addresses and phone numbers;
    - (b) Financial Data: If you are making any payments to us, or we are making any payments to you, you will also provide payment details, which may include billing addresses, credit/debit card details and bank account details;

- (c) Employment and background data: If you are submitting a job application, you may also provide additional information about your academic and work history, qualifications, skills, projects and research that you are involved in, references, proof of your entitlement to work, your national security number, your passport or other identity document details, your current level of remuneration (including benefits), and any other such similar information that you may provide to us; and
- (d) Survey data: from time to time we might ask if you would be willing to participate in our surveys; if you agree, we will also collect any information that you provide as part of that survey.

### 3.2. Information we collect about you:

- 3.2.1. Information contained in correspondence: we will collect any information contained in any correspondence between us. For example, if you contact us by post or by email or telephone, we may keep a record of that correspondence;
- 3.2.2. Transactional data: we will collect information related to our transactions with you including the date and time, the amounts charged and other related transaction details; and
- 3.2.3. Website usage and technical data: We will also collect certain information about how you use our website and the device that you use to access our website, including information such as IP addresses, geographical location, device information (such as your hardware model, mobile network information, unique device identifiers), number of page views, and similar information. This information may be collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies or similar technologies. For more information on cookies please read the COOKIES section below.

### 3.3. Sensitive Personal Data

- 3.3.1. Special category information: “special categories” of particularly sensitive personal data (Sensitive Personal Data) which includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) and information about criminal convictions and offences require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.
- 3.3.2. We process the following types of Sensitive Personal Data:
  - (a) If you are attending one of our events or are a job applicant, we may process Sensitive Personal Data about your health as necessary for the purpose of arranging your interview and for compliance with our legal obligations to make reasonable adjustments for your circumstances.

### 3.4. Information we receive from third parties

- 3.4.1. In certain circumstances, we will receive information about you from third parties. For example if you are a job applicant we may contact your recruiter, current and former employers and/or referees, who may be based inside or outside the UK, to provide information about you and your application.

- 3.4.2. We might also receive information about you from third parties if you have indicated to such third party that you would like to hear from us.

#### **4. HOW WE USE INFORMATION ABOUT YOU AND RECIPIENTS OF YOUR INFORMATION**

4.1. We will use your information for the purposes listed below either on the basis of:

- 4.1.1. performance of your contract with us and the provision of our services to you;
- 4.1.2. your consent (where we request it);
- 4.1.3. where we need to comply with a legal or regulatory obligation; or
- 4.1.4. our legitimate interests or those of a third party (see paragraph 4.3 below).

4.2. We use your information for the following purposes:

- 4.2.1. To provide our services to you: to provide our services to you (on the basis of performing our contract with you, or otherwise on the basis of our legitimate interest to conduct our business);
- 4.2.2. To respond to enquiries: to respond to any enquires you make over the phone, by email, in particular when you make inquiries about the provision of our services to you (on the basis of our legitimate interest to respond to inquiries from prospective clients);
- 4.2.3. To provide access to our website: to provide you with access to our website in a convenient and optimal manner, including sharing your information with our website hosts and developers (on the basis of our legitimate interest to ensure our website is presented in an effective and optimal manner);
- 4.2.4. To process and facilitate transactions with us: we will use your information to process transactions and payments, and to collect and recover money owed to us (on the basis of performing our contract with you and on the basis of our legitimate interest to recover debts due);
- 4.2.5. Relationship management: to manage our relationship with you, which will include notifying you about changes to our website terms of use or privacy notice, and asking you to leave a review or take a survey (on the basis of performing our contract with you, to comply with our legal obligations and on the basis of our legitimate interests to keep our records updated and study how our website and services are used);
- 4.2.6. Recruitment: to process any job applications you submit to us, whether directly or via an agent or recruiter including sharing this with our third party recruitment agency (on the basis of our legitimate interest to recruit new employees or contractors);
- 4.2.7. Marketing: to keep in contact with you about our news, events, new products or services that we believe may interest you, provided that we have the requisite permission to do so, and sharing your information with our marketing services provider (either on the basis of your consent where we have requested it, or our legitimate interests to provide you with marketing communications where we may lawfully do so);
- 4.2.8. Social media interactions: to interact with users on social media platforms including Facebook, LinkedIn, X, Pinterest, Instagram, Google+, Snapchat, Vimeo, Creative

and Behance, for example, responding to comments and messages, posting, 'retweeting' and 'liking' posts (on the basis of our legitimate interest in promoting our brand and communicating with interested individuals);

- 4.2.9. Analytics: to use data analytics to improve our website, products/services, marketing, customer relationships and experiences (on the basis of our legitimate interests in defining types of customers for our website and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy);
  - 4.2.10. Research: to carry out aggregated and anonymised research about general engagement with our website (on the basis of our legitimate interest in providing the right kinds of products and services to our website users);
  - 4.2.11. Fraud and unlawful activity detection: to protect, investigate, and deter against fraudulent, unauthorised, or illegal activity, including identity fraud (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so); and
  - 4.2.12. Compliance with policies, procedures and laws: to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees and share your information with our technical and legal advisors (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so).
- 4.3. As outlined above, in certain circumstances we may use your personal data to pursue legitimate interests of our own or those of third parties. Where we refer to using your information on the basis of our "legitimate interests", we mean our legitimate business interests in conducting and managing our business and our relationship with you, including the legitimate interests we have identified in section 4.2.
- 4.4. Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing please refer to details of "Your Rights" below.

## **5. WHO WE MIGHT SHARE YOUR INFORMATION WITH**

- 5.1. In connection with the purposes and on the lawful grounds described above and in addition to the recipients of your information as described above, we will share your personal data when relevant with third parties such as:
  - 5.1.1. Our service providers: service providers we work with to deliver our business, who are acting as processors and provide us with:
    - (a) Venues and related services for our events;
    - (b) IT, system administration and security services;
    - (c) analytics providers (including Google Analytics);
    - (d) payment services;
    - (e) identity verification, fraud prevention and detection services;

- (f) banking services;
  - (g) legal, accountancy, auditing and insurance services and other professional advisers; and
  - (h) recruitment service providers.
- 5.1.2. Our affiliates from time to time;
- 5.1.3. Regulators and governmental bodies: HM Revenue & Customs, regulators, governmental bodies and other authorities acting as processors or joint controllers based in the UK and USA who require reporting of processing activities in certain circumstances;
- 5.1.4. Marketing parties: any selected third party that you consent to our sharing your information with for marketing purposes;
- 5.1.5. Prospective sellers and buyers of our business: any prospective seller or buyer of such business or assets, only in the event that we decide to sell or buy any business or assets; and
- 5.1.6. Other third parties (including professional advisers): any other third parties (including legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) based in the UK, USA and any other specific countries where our client may be located or our services may be required where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.  
We require third parties to maintain appropriate security to protect your information from unauthorised access or processing.

## **6. COOKIES**

- 6.1. We use cookies to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. Cookies allow us to monitor your use of the software and simplify your use of the website.
- 6.2. If you do not wish for cookies to be installed on your device, you can click the “reject” button in the cookie banner showing when you first access our website, or change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the “Help” section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that there may be certain cookies which are strictly necessary for our website to function, and so you cannot reject any such necessary cookies. If you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the website.
- 6.3. The names of the cookies used on our website and the purposes for which these cookies are used are set out in the table below:
- 6.3.1. Cookie Name Purpose Duration
- (a) `_gat` used to throttle request rate 1 minute
  - (b) `_gid` used to distinguish users 24 hours
  - (c) `_ga` used to distinguish users 2 years

- 6.3.2. Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don't control these third party sites or cookies and this Privacy Notice does not apply to them. Please consult the terms and conditions and Privacy Notice of the relevant third party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

## **7. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR**

- 7.1. We operate a policy of "privacy by design" by looking for opportunities to minimise the amount of personal data we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:
  - 7.1.1. ensuring the physical security of our offices, warehouses or other sites;
  - 7.1.2. ensuring the physical and digital security of our equipment and devices by using appropriate password protection;
  - 7.1.3. maintaining a data protection policy for, and delivering data protection training to, our employees; and
  - 7.1.4. limiting access to your personal data to those in our company who need to use it in the course of their work.
- 7.2. We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are permitted to do. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For further information about our data retention policy you can contact the us using the details at the top of this Privacy Notice.

## **8. INTERNATIONAL TRANSFERS OF YOUR INFORMATION**

- 8.1. We are based in the UK, but we may transfer information about you outside of the UK.
- 8.2. Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.
- 8.3. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following transfer solutions are implemented (for further details, see the information provided on the website of the Information Commissioner's Office, at [www.ico.org.uk](http://www.ico.org.uk)):
  - 8.3.1. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government;
  - 8.3.2. Where we use certain service providers, we may use specific contracts approved by the UK government which give personal data the same protection it has in the UK; and
  - 8.3.3. Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in UK; and
  - 8.3.4. Where we use providers based in the US, we may transfer data to them if they are part of the UK Extension to the EU-U.S. Data Privacy Framework, or where we have

ensured that appropriate safeguards exist to ensure that individuals' rights are enforceable and effective legal remedies are available following the transfer.

- 8.4. Please contact us using the contact details at the top of this Privacy Notice if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **9. YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU**

- 9.1. You have certain rights in respect of the information that we hold about you, including:
- 9.1.1. the right to be informed of the ways in which we use your information, as we seek to do in this Privacy Notice;
  - 9.1.2. the right to ask us not to process your personal data for marketing purposes;
  - 9.1.3. the right to request access to the information that we hold about you;
  - 9.1.4. the right to request that we correct or rectify any information that we hold about you which is out of date or incorrect;
  - 9.1.5. the right to withdraw your consent for our use of your information in reliance of your consent (refer to section 2 above to see when we are relying on your consent), which you can do by contacting us using any of the details at the top of this Privacy Notice;
  - 9.1.6. the right to object to our using your information on the basis of our legitimate interests (refer to section 2 above to see when we are relying on our legitimate interests) (or those of a third party)) and there is something about your particular situation which makes you want to object to processing on this ground;
  - 9.1.7. the right to receive a copy of any information we hold about you (or request that we transfer this to another service provider) in a structured, commonly-used, machine readable format, in certain circumstances;
  - 9.1.8. in certain circumstances, the right to ask us to limit or cease processing or erase information we hold about you; and
  - 9.1.9. the right to lodge a complaint about us to the UK Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)) as well as a right to lodge a complaint with the relevant authority in your country of work or residence.
- 9.2. How to exercise your rights
- 9.2.1. You may exercise your rights above by contacting us using the details in paragraph 2 of this Privacy Notice.
  - 9.2.2. Please note that we may need to retain certain information for our own record-keeping and research purposes. We may also need to send you service-related communications even when you have requested not to receive marketing communications.
- 9.3. What we need from you to process your requests
- 9.3.1. We may need to request specific information from you to help us confirm your identity and to enable you to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed

to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- 9.3.2. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. SHARING DATA DIRECTLY WITH THIRD PARTIES**

- 10.1. You might end up providing personal data directly to third parties as a consequence of your interactions with our website and other services offered by us. For example, you may attend an event hosted by us where you communicate personal data directly with other attendees. We are not responsible for how such third parties use personal data provided by you.
- 10.2. Please be responsible with personal data of others when using our website and the services available on it. We are not responsible for your misuse of personal data, or for the direct relationship between you and others when takes place outside of the website or our services.

## **11. THIRD-PARTY LINKS**

- 11.1. The website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **12. CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

- 12.1. We may make changes to this Privacy Notice from time to time. We will post any changes to our site, or notify you of any material changes by e-mail.
- 12.2. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by updating your profile account information or contacting us via the contact details at the top of this Privacy Notice.

This Privacy Notice was updated on 13 March 2025.