

# Privacy policy app version

This policy was last updated on the 25th May 2018.

At Clarifi Media Limited, we are committed to protecting and respecting your privacy. Here, we tell you how we will use the personal information you send us.

## Why do we need your personal information?

Festyvent uses data from a variety of sources to give event goers and users of our app (“you”) the best possible event experience. This means everything from being able to find friends at a venue, letting you know where you left your car or tent or getting updated on the latest offers available around a particular stage or location. So that you can feel comfortable using Festyvent it is important that you understand what personal information we can access and collect about you and what we do with that information.

This Privacy Policy (together with our Terms of Use [here](#)) tells you how any personal data we obtain about you will be processed by us. Unless stated otherwise, we use the same definitions here as in the Terms of Use.

By visiting downloading and using this app you are accepting and consenting to the practices described in this policy, and warrant that all data provided by you is accurate.

## Who collects the data?

For the purpose of the General Data Protection Regulation and other applicable data protection laws in force in the UK from time to time, the data controller, who collects and manages the data, is Clarifi Media Limited of Winnington House, 2 Woodberry Grove, North Finchley, London N12 0DR, United Kingdom (“we”, “us”, “our”).

It is important you understand that whilst we are the main data controller in respect of the data collected through this app, the majority of dealings with your data will be carried out by the event organisers responsible for running the event for the app you have downloaded. We share your data with the event organisers, who will also be controllers of your data, but they may only use your data on the basis set out in this privacy policy. The relevant organiser for this event is named in all relevant permission forms and the About page of this app.

## What information do we collect from you?

We may collect and process the following data about you:

### 1. Information you give us directly

You may give us information about you by:

- filling in forms on the app (for example, to create an account or to grant certain access or communication permissions) submitting information via the app (including by marking which events you will attend and use of our communications feature from public messaging boards to private messages); or
- corresponding with us by phone, e-mail, online support request forms or otherwise.

This includes information you provide when you:

- register to use the app
- give us access to your phone contacts list, photo library or phone calendar (only with your permission)
- participate in any social media functions on the app
- enter a competition, promotion or survey
- report a problem with the app.

The personal information you give us may include your name, address, e-mail address and phone number (and those of your phone contacts, if you have permitted us to access your contacts list), financial and credit card information, personal descriptions, photographs, and details of your favoured artists and attended events (if you have permitted us to access your calendar). At a minimum we will need your email address or other social media login to set up your account and provide you with the key features of the app.

### 2. Information we collect about you

When you visit or use the app we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, [browser type and version], time zone setting, browser plug-in types and versions, operating system and platform;

- information about your usage of the app, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); music and videos you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number; and
- information about your location (only with your permission). This will be your GPS-based location data from 24 hours before the start of the event until the end of the event and is collected through via your phone's location services feature and iBeacons technology (see "Cookies and automated information collection" below). You can enable or disable location services at any time through your mobile device settings.

### **3. Information we receive from social media sites**

When you use the app with a social media site (such as to share photos to Instagram), or use a social media login such as Facebook, you allow us to access certain information from your profile for that site. This information could include your name, photograph, gender, age and birthday. The information you allow us to access depends on the social media site you are using and is affected by the privacy settings you and your friends use on the social media site. You can control and find out more about these settings through the relevant social media site's privacy policy.

### **4. Information we receive from other sources**

We may receive information about you if you use any of the other websites we operate or the other services we provide through our app, such as ticketing websites or contactless payment. If so, we will have informed you when we collected that data that it may be shared internally and combined with data collected on Festyvent.

We are also working closely with third parties who help provide our services to you (including, for example, business partners, sub-contractors in technical, payment services, advertising networks, analytics providers, search information providers, and may receive information which has been collected about you on our behalf from them.

Information we receive from other sources may be combined with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive). For example, to make the service more efficient, we may use multiple data sources to identify issues with the service which we can improve.

## 5. Cookies and automated information collection

We use cookies to distinguish you from other users. Cookies are small text files which are placed on your device to help keep track of your visits and activity on the app (e.g. to remember your login details and preferences). This helps us to provide you with a good experience when you use the app.

This means that when you access the app, we collect certain technical information in order to:

- analyse the usage of our app and associated services;
- provide a more personalised experience; and
- manage targeted messages.

We also employ other technologies to fulfil the above purposes including (i) iBeacons, (ii) tracking pixels, and (iii) local shared objects also known as 'flash cookies'.

We use the Flurry Analytics and Google Analytics software to analyse usage of specific in-app features. We do not use any of Flurry's advertising capabilities and nor do we have any plans to do so. You may opt out of Flurry Analytics [here](#) and Google Analytics by clicking [here](#).

You can set your mobile device to warn you about attempts to place cookies on your device or limit the type of cookies you allow. If you disable cookies, it is likely you will lose some of the features and functionality of using our apps, as cookies are necessary to support, track and enhance your app activities. Please note that companies delivering advertisements on the app may also use cookies or other technologies, and those practices are subject to their own policies.

## Information on children

Our app is not directed to children under the age of 18. None of our services are available to children. We do not knowingly collect personal information from children. If you are a parent or guardian and become aware that your child has provided us with personal information, please contact us and we will delete the relevant information from our servers.

## How do we use your information?

We will only use your personal data if we have a permitted lawful basis to do so. Generally we use information held about you because it is necessary for one of the following:

### **Performing our contract with you**

- To carry out our contractual obligations to you and to provide you with the information and services that you request from us including the use of our app
- To ensure that content from our site and app is presented in the most effective manner for you and for your device

### **Pursuing our legitimate interests**

- To notify you about changes to our service
- To administer our app for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our app and services
- To measure or understand the effectiveness of the events you attend
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- To help advertisers display their advertisements to their target audience (this will only involve the disclosure of your personal data on an aggregated basis – see “Who do you share my information with?” below).

### **Complying with our legal obligations**

- To comply with our legal and regulatory obligations (including under applicable data protection laws)
- For preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies
- To fulfil our duties to our customers, colleagues and other stakeholders
- As part of our efforts to keep our app safe and secure

### **Your consent**

- To allow you to participate in interactive features of our service, when you choose to do so (e.g. submitting your phone number and turning on location services allows you to identify and connect with our other users through the Find-a-Friend feature)
- For marketing goods or services that we, or selected third parties offer which we feel may interest you based on your age, gender, location, and/or attended events (such as other apps for events relating to these).

Messages may be sent by SMS, email or push notifications (see “Push Notifications” below) according to your chosen communication preferences. You can withdraw your consent to these messages or change your communication preferences at any time by emailing [support@festyvent.com](mailto:support@festyvent.com).

## **Push notifications**

Push notifications are updates that can automatically appear on your phone as an alert or pop up message following a particular event. For example, if you get a pop-up message when you get a new Facebook message, or your news app identifies a headline as ‘breaking news’, that is a push notification. We (or more likely the event organiser) may send push notifications to your mobile device to provide relevant messages and app updates. You can manage push notifications from your device’s settings page for the relevant app.

## **Who do we share your information with?**

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- The event organisers
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you (e.g. credit card agencies)
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may also share your information with the following parties on an aggregated basis only:

- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We will not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1).

- The networks analytics provider, Teragence. We may occasionally send and receive small packets of data to your phone to ascertain the quality of your mobile network. We do this through a separate measurement mechanism which respects your privacy. We do NOT look at your phone usage or your specific network traffic. The information we collect in this way is aggregated and provided to third parties in the mobile network sector for the sole purpose of understanding and improving network performance and customer experience. If you have any additional questions with regards to the nature of the information collected and how it is used, please contact [info@teragence.com](mailto:info@teragence.com). If, after considering the above information, you do not want the collection and processing of such network performance and customer experience data, please remove the application from your device.

We may disclose your personal information to third parties in the following circumstances:

1. If Clarifi Media Limited or substantially all of its assets are acquired by a third party, in which case aggregated personal data held by it about its customers will be one of the transferred assets.
2. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use here and other agreements; or to protect the rights, property, or safety of Clarifi Media Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
3. Where it is necessary to do so to perform our contract with you or run our app smoothly.

## **Do you transfer my data abroad?**

The data that we receive from you may be transferred to, and stored at, a destination outside the European Economic Area ('EEA'). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of any payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing of data abroad.

We will ensure that these are made subject to appropriate safeguards as required by applicable data protection laws, to ensure that your data is treated securely, lawfully and in accordance with this privacy policy. You can obtain further details about theses safeguards and how we protect your data when it is sent abroad by contacting [support@festyvent.com](mailto:support@festyvent.com).

## How do we store your data?

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our app, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet and mobile networks is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our app; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## What are your rights in respect of your data?

In certain circumstances you have rights under data protection laws in relation to the personal data we hold about you. You can request to:

- access information held about you
- rectify any incorrect or incomplete data we hold about you
- delete, restrict or remove the data we hold about you. To delete your account entirely please see the section “Deleting your account” below
- transfer the data we hold about you to another party
- object to any further processing of your data.

We will endeavour to respond to your requests within one month and free of charge. Please note that in respect of all these rights, we reserve the right to:

- refuse your request based on the exemptions set out in the applicable data protection laws
- request for proof of your ID to process the request or request further information
- charge you a reasonable administrative fee for any repetitive, manifestly unfounded or excessive requests.

If we refuse your request to exercise these rights, we will give reasons for our refusal and allow you to challenge our decision.

If you have any concerns about how we handle your data, please contact us. If you are not satisfied after we've tried to resolve your issue, you'll be entitled to lodge a complaint with our regulator, the Information Commissioner's Office (ICO). Please see the ICO website for further details, [www.ico.org.uk](http://www.ico.org.uk).

## **How long do you keep my data?**

We keep your data for as long as it's necessary to meet the relevant purposes for which we've collected your data, including for the purpose of satisfying any legal, accounting or reporting requirements.

To determine the appropriate length of time for holding your data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm, from unauthorised use or disclosure of your personal data, the purpose for which we process your data and whether we can achieve those purposes through other means, along with the applicable legal requirements.

## **Deleting your account**

If you no longer want us to use your information, you will need to email [support@festyvent.com](mailto:support@festyvent.com) with the subject line 'DELETE MY ACCOUNT'. This email must include your first name, last name, email address and/or the relevant user name and ID code for the social network which you use to access the app and/or the site. We will respond to your request within thirty days. Please note that certain records such as those concerning customer services matters will be retained for a reasonable period in case any legal disputes arise in the future. It may not be possible to delete all posts or comments which you have made using the app if they have been made through third party platforms.

## **Third party websites**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [support@festyvent.com](mailto:support@festyvent.com). Any formal notice under this policy will only be effective if sent in writing to Clarifi Media Limited, Winnington House, 2 Woodberry Grove, North Finchley, London N12 0DR, United Kingdom.

Thank you for using Festyvent.