

Last updated: June 6 2023

## PRIVACY NOTICE

This privacy policy (the "**Policy**") informs you about the processing of your personal data collected during your visit on our website <http://the-brand-new-heavies.com/> (hereinafter the "**Site**").

The Policy addresses the following topics:

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### DATA CONTROLLER

[\_\_ (“\_\_”, “**us**” or “**we**”), whose registered office is located \_\_], is the data controller for the processing of your personal data described in this Policy.

Personal data means any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number or any element specifically relating to that person.

### DATA SUBJECTS

We process your personal as described in this Policy if you are a visitor of the Site and when you interact with its content.

### PERSONAL DATA COLLECTED

**3.1.** We collect and process your email address that you provide us if you subscribe to our newsletter. If you contact us to exercise your rights in accordance with section 8 of this Policy, we will collect and process the additional information you provide us in this context, such as your name and surname.

**3.2.** Our Site also contains a “Shop” and “Live” sections hosted and operated by the third parties [\_\_] (for the “Shop” section), Songkick (for the “Live” section) as well as videos and links to third-party platforms such as YouTube, Twitter, Instagram or Spotify. When you click on these links and interact with these third-party sections or platforms, your personal data may be collected and processed by the third parties operating these sections and platforms in accordance with their own privacy policies.

### PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

We collect your personal data for the following purposes, and we rely on the following legal basis:

Purposes	Legal basis
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Send you newsletters about “The Brand New Heavies” as well as our company’s activities and the other artists we represent.	Your consent
Process your requests regarding the exercise of your rights in accordance with Section 8 of this Policy.	Our legal obligation to respond to data subjects’ requests

#### RETENTION PERIODS OF YOUR PERSONAL DATA

**5.1.** We retain your personal data for a limited period of time and in a secure manner. The period for which your personal data are retained by us depends on the purposes for which they were collected, as well as the legal and regulatory requirements with which we must comply.

Your personal data will be kept in our active database for no longer than the following periods:

Purposes	Retention periods
Data processed for the purpose of sending you newsletters about “The Brand New Heavies” as well as our company’s activities and the other artists we represent.	3 years from the date of collection or last contact from you.
Requests regarding the exercise of your rights in accordance with Section 8 of this Policy.	Until the complete processing of your requests. In case you wish to exercise your right to object to the processing of your personal data for the purpose described above, we will retain your email address during 3 years in our opposition list.

**5.2.** The deletion of your personal data from our active database will be followed by an intermediate archiving period in order to meet our legal, accounting and fiscal obligations, and also to be able to manage any claims, within the limits of the applicable prescription periods.

**5.3** The above retention periods do not prevent you from exercising your rights as detailed in Section 8 of the Policy.

#### RECIPIENTS OF YOUR PERSONAL DATA

Some of your personal data may be communicated, only to the extent necessary and permitted by the applicable regulations, to the following recipients:

- Our authorized staff members who need access to it in the course of their work.
- If you give you consent: [Your email address] will be shared with the promoter Raymond Gubbay for the purpose of sending you information and news via email about [The Brand New Heavies’ tour]. You can consult the privacy policy of Raymond Gubbay by clicking this link: <https://www.raymondgubbay.co.uk/media/1952/privacypolicy.pdf>
- Our data processors acting on our behalf and in accordance with our instructions: these processors include the hosting services provider of the Site, the email provider in charge of delivering our newsletters, [\_\_].
- In the cases provided for by law: the judicial authorities.

- The legal court officers (e.g., bailiffs) as well as our attorneys in case of litigation.

Finally, we inform you that mergers, demergers or sale of our assets may involve the sharing of documents containing personal data to certain third parties, as well as their review, for example in the context of due diligence operations. In the event of such an operation, we will put in place appropriate guarantees and security measures to ensure the confidentiality of your personal data.

#### INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your personal data may be transferred between the UK and EU countries. These transfers are covered by the adequation decisions mutually taken between the UK and the EU. In addition, your personal data may be transferred to: \_\_\_\_].

#### YOUR RIGHTS

In accordance with the laws and regulations pertaining to the protection of personal data, you have the following rights:

- **Access and rectification:** You have the right to access your personal data free of charge and, if necessary, to request its rectification.
- **Erasure:** You may request the erasure of all or part of your personal data in the following cases:
  - When their processing is no longer necessary to the purposes for which they were collected or otherwise processed;
  - When you exercise your right to object to the processing under the conditions indicated below;
  - Where the data has been unlawfully processed; or
  - When their erasure is required to comply with a legal obligation to which we are subject.
- **Withdrawal of your consent:** Where we process your personal data based on your prior consent, you have the right to withdraw it at any time and for the future.
- **Objection:** You may object, on grounds relating to your particular situation that you must communicate to us, to those processing of your personal data which rely on our legitimate interests.

If you exercise this right, we will cease to carry out the concerned processing, unless (i) there are compelling legitimate grounds for the processing which override your interests and rights and freedoms, or (ii) for the establishment, exercise or defence of legal claims.

You also have the right to object to the processing of your personal data for direct marketing purposes.

- **Restriction:** You may request the restriction of the processing of your personal data in the following cases:
  - When you contest the accuracy of your personal data - for a period of time that enable us to make the necessary verifications;

- When the processing is unlawful but you oppose the erasure of the data and request instead the restriction of their use;
- When the processing is no longer necessary for us but you wish us to keep the data for the establishment, exercise or defense of legal claims;
- When you exercise your right to object - for the period of time necessary to verify whether we have compelling legitimate grounds for continuing the processing.
- **Portability:** You may request portability of personal data processed on the basis of your prior consent or the performance of your contract.

You may exercise these rights at any time or ask any other questions regarding our processing of your personal data, by contacting us at [email address]. You can also send a letter to us at the address mentioned in Article 1. In order to facilitate the processing of your request, we invite you to specify in the subject line of your message or letter "*Exercise of my personal data rights*".

You also have the right to file a complaint with the competent supervisory authority.

#### CHANGES TO THIS POLICY

London Records may change this Policy from time to time.

We will ensure that you are informed of these changes.

In any case, we invite you to consult our Policy regularly.