#### **Data Processing Statement**

Issued under the (UK) Data Protection Act 1998 and (EU) General Data Protection Regulation 2018.

#### Statement

WTW-Scott Cinemas Ltd, trading as "Scott Cinemas", is registered as a data controller with the United Kingdom Information Commissioner's Office (ICO) in terms of the Data Protection Act 1998 and General Data Protection Regulation 2018.

Scott Cinemas requires to process and retain, in electronic form or otherwise, certain personal information relating to you or your organisation, to handle and confirm a Private Hire arrangement in any of our cinemas or on any other property owned or managed by Scott Cinemas.

Our legal basis for doing so is that we need access to certain data in order to process your Private Hire arrangement, contact you, issue invoices (where applicable) and collect payments.

#### What information do we collect?

Upon arranging a Private Hire with Scott Cinemas, we collect the following information:

- Your name.
- Your Organisations name.
- Your, or your organisations address.
- Your, or your organisations telephone number.
- Your, or your organisations e-mail address.
- For charity hires, we may also require your charity registration number.

### Why do we collect this information?

In order for a Private Hire to be confirmed, we need to be able to contact you, and the above information is required so that we can do just this. We may need to contact you if:

- Continual discussion surrounding the terms or organisation of your Private Hire.
- There is a change to any detail pertaining to your Private Hire.
- Our cinema teams have to resolve any queries with you pertaining to your Private Hire.
- We need to issue you with an invoice.
- We have an outstanding issue with the payment of your invoice.

We also collect this information so we can analyse trends and market reach. We won't use your information to send any unsolicited messages or marketing communications.

#### How do we store this information?

Your information is stored in a database controlled by proprietary management software that we use to manage Private Hires, among other things. Access to this database is restricted to Scott Cinemas staff who are tasked with the day to day administration of Private Hires and employees of Steerment Ltd, as the creator and maintainer of the database software.

## Who else has access to my information?

Once a Private Hire is confirmed, an e-mail notification is sent to:

a) Our Accounts & HR Manager and our Accounts & HR Assistant, in order to process payments and in the legitimate interests of our business in relation to accounting.

b) The cinema which the Private Hire is arranged in, in order so as they can prepare for your hire.

At cinema level, only the cinema management have access to your information.

We may also be required to pass your contact details to a film distributor in order for them to approve the provision of a feature film or other content to be used during a Private Hire. This is generally only necessary for none-standard content, such as charity premieres and advance screenings of products not on general release. We will always tell you if we have to pass your contact details on in this manner.

We do not share your information with any other third party, nor do we transmit or share your data outside of the EU.

# How long is my information held for?

A record of your Private Hire, containing your information, is held on our system for a period of 12 months after the Hire date. Our justification for this is that it is in our legitimate business interests to be able to compile a list of Private Hires executed during a calendar year to look at elements including but not limited to: profit & loss, tax implications, track trends and track external payments that we have to make to film distributors and integration partners.

Its also useful for us to keep this information in case you want to hold further Private Hires, so we can look at past information to held set up future events as quickly and easily as possible.

## I am representing an Organisation, how is my Organisations information processed?

If you are an Organisation and have requested to pay by Invoice, your information will be used in the following ways in addition to the above policies:

- We input the information stated onto our Sage accounting system so as to be able to generate an invoice, and mark it as paid when it has been.
- If you fail to pay your invoice within a reasonable amount of time, we reserve the right to
  pass the value onto a Debt Collection Agency to retrieve the outstanding payment. In this
  situation, all information pertaining to your Private Hire will be passed on.

### I'm not happy with you having my personal information

We're unable to arrange any Private Hires for any individual or Organisation where we cannot collect the information as described above, as we cannot administrate your Private Hire without it. In these situations, we suggest that you arrange to attend a publicly available screening at the cinema of your choice.

### **Your Right of Complaint**

If you believe there is a problem with the way in which we are handling your information, you have the right to complain to the ICO.

Scott Cinemas is registered with the ICO as a Data Controller, registration number ZA347759.