

TRACKDOWN MUSIC LIMITED
PRIVACY POLICY

Trackdown Music Limited ("**We**", "**Us**") is committed to protecting and respecting your privacy. This Privacy Policy ("**Policy**") (together with any other documents referred to therein) sets out the basis on which the personal data collected from you, or that you provide to Us will be processed by Us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation ("**GDPR**") and the Data Protection Act 2018, (collectively the "**Data Protection Laws**") the Data Controller is Trackdown Music Limited.

YOUR PERSONAL INFORMATION

Information we collect from you

We collect and process some or all of the following types of information from you in the course of providing our services:

- Information that you provide by telephone, email or letter.
- Specifically, personal details such as name, address, email address, telephone numbers, date of birth, tax or other identifiers and bank account details.
- If you contact Us, We may keep a record of that correspondence.

We do not collect any personal data relating to your use of our Website.

USES MADE OF YOUR INFORMATION

Lawful basis for processing

If you have entered into a contract with Us, We may process your data in order to perform our obligations pursuant to that contract. Where We do so we rely on "*performance of a contract*" as the lawful basis upon which we collect and process your data.

If you are engaged by one of our clients, We may process your data in order to perform our obligations pursuant to a contract with that client. Where We do so we rely on "*legitimate interest*" and the legitimate interest is "*carrying out a contract with a customer*".

Where you have contacted Us via post, e-mail or telephone, We rely on "*legitimate interest*" and the legitimate interest is "*responding and contacting you regarding the enquiries you have made in relation to the services we offer*".

We rely on "*compliance with a legal obligation*" as the lawful basis on which we store and share your personal data with HMRC where this is required by them as evidence of our compliance to our business and financial records management obligations.

Purposes of processing

We use information held about you in the following ways:

- To provide you with our services.
- To carry out our obligations arising from any contracts entered into between you and Us.
- To verify your identity for tax and security purposes.
- To notify you about changes to our service.

DISCLOSURE OF YOUR INFORMATION

We routinely disclose your personal data to third parties as follows:

- We may pass your information to our third party services providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. our accountants, software and technology providers).
- We may share your personal data with our banks for the purpose of making payments to you.

We may also disclose your personal data to third parties:

- in the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if We or substantially all of our assets are acquired by a third party, in which case personal data held by Us about our clients will be one of the transferred assets; or
- if We are under a duty to disclose or share your personal data in order to comply with any legal obligation; or
- to protect Our rights, property, or safety or that of our affiliated entities and our users and any third party We interact with to provide the Website.

Other than as set out above, and save insofar as is necessary in order for Us to carry out our obligations arising from any contracts entered into between you and Us, We will not share your data with third parties unless We have procured your express consent to do so.

STORING YOUR PERSONAL DATA

Security

We take appropriate measures to ensure that any personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet 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 Us via email; 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.

The Website 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 terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

Keeping your personal data up to date

If your personal details change you may update them by contacting Us using the contact details below. If you have any questions about how We use data collected which relates to you, please contact Us by sending a request by email to the contact details below.

We will endeavour to update your personal data within fourteen (14) working days of any new or updated personal data being provided to Us, in order to ensure that the personal data We hold about you is as accurate and up to date as possible.

How long we keep your personal data

We will hold the data set out above for a reasonable time having regard to the nature of the personal data and the purpose for which it was collected. In particular:

- If you contact Us via post, e-mail or telephone requesting general information about our services, We will hold personal data you choose to provide or We have collected from you such as your name, company name, email address, for three (3) years from our last point of contact.
- Where you have entered into a contract with us, we hold your personal data in connection with the performance of the contract, and in particular any communications between you and us in relation to the negotiation or performance of the contract by either party for so long as that contract is in force and for a period of at least six (6) years after (in accordance with applicable UK tax law).
- If you are engaged by one of our clients or suppliers, We will hold your contact details for at least 6 years after our last communication and/or payment to you pursuant to our contract with such client or supplier.

Where we store your personal data

All information We hold about you is stored on our supplier's secure servers within the UK.

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by our suppliers operating outside the EEA who work for Us, such as our banking provider. Such suppliers may be engaged in, among other things, the processing of your payment details and the provision of support services.

Such countries do not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that such countries provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal data will be subject to the appropriate or suitable relevant safeguards (as permitted under Article 46(5) of the General Data Protection Regulation) that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data. Please contact Us to obtain a copy of such safeguards.

If you would like further information please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom or to any international organisation.

YOUR RIGHTS

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Policy is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to Us
- let Us have enough information to identify you
- let Us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let Us know the information to which your request relates

HOW TO COMPLAIN

We hope that We can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with your relevant supervisory authority. In particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Policy at any time. Any changes We may make to our Policy in the future will be notified where appropriate and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy policy.

CONTACT

All questions, comments and requests regarding this Privacy Policy should be addressed to jo.tizard@trackdownmusic.co.uk or write to Us at, Trackdown Music Limited, Ickenham Manor, Long Lane, Ickenham, Uxbridge, UB10 8QT. You can also contact us on 01895 672994.