



**Smiles Better Entertainment**  
**PRIVACY NOTICE FOR OUR CUSTOMERS**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your transaction with us. This notice applies to you if you have registered your details with us. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we, our or us** in this privacy notice are to **Smiles Better Entertainment**.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Data Officer has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

**1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of transaction, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- your marketing preferences so that we know whether and how we should contact you.

**2. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you register an account with us, request a quotation, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

**3. USES MADE OF THE INFORMATION**

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>To administer any enquiries or orders you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you</b>	All contact details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your contract with us.
<b>To arrange and manage any contracts for the provision of any</b>	Contact details, transaction and payment	This is necessary to enable us to properly administer and perform any contract for the

<b>services or products</b>	information. Records of your interactions with us.	provision of any services and products you have purchased from us.
<b>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about our products.</b>	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
<b>Retention of records</b>	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your information and run our business and in some cases we may have legal or regulatory obligations to retain records.
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>For the purposes of promoting the business, our events and packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all and to ensure the effective management of any disciplinary hearings, appeals and adjudications.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above  For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

#### 4. **DIRECT MARKETING**

**Email, post and SMS marketing:** from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at [info@smilesbetterphotobooth.com](mailto:info@smilesbetterphotobooth.com). You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

#### 5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **Other service providers:** for example, email marketing specialists, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

#### 6. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

We do not foresee that the personal information we collect will be transferred to and stored in countries outside of the UK and the European Union. However, if this is required by one of our service providers, some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third part processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

#### 7. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 7 years after your last contact with us or the end of your contract. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Details regarding unsuccessful contracts where we hold records for a period of not more than 12 months;

- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

## 8. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 9. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## 10. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [info@smilesbetterentertainment.com](mailto:info@smilesbetterentertainment.com) or write to us at 25 Coleman Road, Dagenham, Essex, RM9 6JU

**Version dated 21<sup>st</sup> May 2018**