PRIVACY POLICY

This Privacy Policy sets out the data processing practices carried out through the use of the internet and any other electronic communications networks by CSM Sport & Entertainment LLP (company number OC368517) of PO BOX 70693, 10a Greencoat Place, London, SW1P 1PH (and any of its group companies) (**CSM**, **we** or **us**).

We have appointed a data privacy champion who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy champion using the details set out below.

CONTACT DETAILS

Full name of legal entity:	CSM Sport and Entertainment LLP
Title of data privacy champion:	Oliver Price
Email address:	csm.legal@csm.com
Postal address:	CSM Sport and Entertainment, 10a Greencoat Place, London, SW1P 1PH

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

This policy applies to the following websites:

- https://www.csm.com/
- https://csmretail.com/
- https://csmlive.com/
- and any other website or online platform owned or operated by us and/or linking to this Privacy Policy (each a **Website**)

CSM operates as a group of companies and CSM Sport and Entertainment LLP will be the controller and responsible for your personal data.

1   DATA COLLECTED

1.1   Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

1.2   We collect personal information from visitors to this Website which we have grouped together as follows:

(a)   Identity Data such as first name, last name and date of birth;

(b)   Contact Data such as address, email address and telephone numbers;

(c)   Technical Data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;

(d)   Usage Data such as information about how you use our website, products and services; and

(e)   Marketing and Communications Data such as your preferences with regards to receiving marketing from us.

1.3   Only Technical and Usage Data are collected automatically when you visit any of the Websites (please see the section on how we collect your personal data for further information).

2   HOW WE COLLECT YOUR PERSONAL DATA

2.1   We use different methods to collect data from and about you including through:

(a)   **Direct interactions.** You may give us your Identity, Contact, and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

(b) **Automated technologies or interactions**. As you interact with our website(s), we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see the section on cookies below.

3 USE OF PERSONAL INFORMATION

3.1 We process personal information collected via this Website for the purposes of:

(a) providing and personalising our services;

(b) dealing with your enquiries and requests;

(c) maintaining information as a reference tool or general resource;

(d) carrying out market research campaigns; and

(e) providing you with information about products and services.

3.2 We may use your data to send you information regarding our products or services, products or services offered by other companies within our group but only if you specifically consent to receiving such marketing materials. You may withdraw your consent to receive these marketing materials at any time by selecting the unsubscribe button included in all communications sent to you by us.

3.3 We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

3.4 We have set out below, all the ways we use your personal data, and the legal bases on which we rely to do so.

Purpose	Category of Data	Lawful basis for processing including basis of legitimate interest
Administering and protecting our business and our websites: (a) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To manage our relationship with you (a) Notifying you of changes to our privacy policy (b) Contacting and corresponding with you in relation to employment opportunities	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To use data analytics to improve our website, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To deliver relevant marketing materials to you (in the form of our newsletter) and to measure or understand the effectiveness of	(a) Identity (b) Contact	Consent (you will only receive our newsletter where you have separately consented to doing

the advertising we serve to you	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	so by signing up to the newsletter. You may remove your consent at any time by following the opt-out links which can be found on all communication we will send to you)
To fulfil event bookings	(a) Identity (b) Contact (c) Profile	Necessary for the fulfilment of any event bookings, including any hospitality purchases. Information may be passed on to third parties for such fulfilment and this shall include event venue, catering providers, event rights holders and other relevant third parties

4   DISCLOSURES

4.1   We will disclose personal information to other companies within our group of companies, government bodies and law enforcement agencies, successors in title to our business and suppliers we engage to process data on our behalf.

4.2   Where you have submitted your personal data for the purposes of an event booking via CSM Corporate Hospitality, your data will be processed in accordance with this policy and the policy on https://csmcorporatehospitality.com/privacy-policy.

4.3   Personal data may be stored on cloud based servers with authorised third parties.

4.4   CSM is ISO 20071 certified.

5   SECURITY

5.1   We take the security of your information very seriously, and have controls and processes to minimise the risk of a data breach occurring, though you must take responsibility when visiting other websites, even if following a link to them from our Website.

5.2   We have put in place procedures to deal with any suspected or actual personal data breach and will notify you or the appropriate regulator where we are legally required to do so, and we will make all efforts to minimise the impact.

5.3   We may use external companies to process information which are based overseas and outside Europe. We ensure that they have strict checks and controls in place to keep your information safe.

6   DOCUMENT RETENTION

6.1   We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

6.2   To determine the appropriate retention period for personal 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 purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

7   OTHER WEBSITES

Our Website may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

8   ACCESS RIGHT

Under certain circumstances, you have rights under data protection laws in relation to your personal data such as:

- Requesting access to your personal data;

- Requesting a correction to your personal data;

- Requesting erasure of your personal data;

- Objecting to the processing of your personal data;

- Requesting a restriction on the processing of your personal data;

- Requesting a transfer of your personal data; and/or

- Your right to withdraw your consent.

If you wish to exercise any of these rights please email us at csm.legal@csm.com. No fee is usually required to exercise your rights under data protection law, however we may charge £10 if your request is clearly unfounded, repetitive, excessive or if you require further copies of the information that we have already sent you.

9   INTERNET-BASED TRANSFERS

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing this Website and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

10   COOKIE POLICY

10.1   Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

10.2   Use of cookies:

(a)   We process personal information collected via this Website for the purposes of dealing with your enquiries and requests.

(b)   You can find more information about the individual cookies we use and the purposes for which we use them in the tables below:

10.2.1   For www.csm.com:

Cookie	Name	Purpose	More information
ASP.NET_SessionId	ASP.NET_SessionId	This cookie is a system cookie that keeps the user session ID for security reasons.	Microsoft.NET https://docs.kentico.com/display/K9/Reference+-+Kentico+cookies
.ASPXFORMSAUTH	.ASPXFORMSAUTH	This cookie is essential to store your encrypted authentication ticket when using forms authentication.	Microsoft.NET https://docs.kentico.com/display/K9/Reference+-+Kentico+cookies
CMSCsrfCookie	CMSCsrfCookie	This cookie is essential for our site to store a security token that the system uses to validate all form data submitted via POST requests. Helps protect against cross site request forgery.	Kentico CMS https://docs.kentico.com/display/K9/Reference+-+Kentico+cookies
CMSPreferredCulture	CMSPreferredCulture	This cookie is essential for our site to store your preferred content culture (language).	Kentico CMS https://docs.kentico.com/display/K9/Reference+-+Kentico+cookies
CMSPreferredRegion	CMSPreferredRegion	This cookie is essential for our site to store your preferred content region.	
seen-cookie-message	seen-cookie-message	This cookie is a functional cookie to prevent the cookie banner message from displaying on every page view.	
VisitorStatus	VisitorStatus	This cookie is an analytical cookie indicating if you are a new or returning visitor.	Kentico CMS https://docs.kentico.com/k9/configuring-kentico/adding-cookie-law-consent-to-web-pages/reference-kentico-cookies
CurrentContact	CurrentContact	Stores the GUID of the contact related to the current site visitor. Used to track activities on the website.	Kentico CMS https://docs.kentico.com/k9/configuring-kentico/adding-cookie-law-consent-to-web-pages/reference-kentico-cookies
dnn_IsMobile	dnn_IsMobile	This cookie identifies if the user has specified they are using a mobile device.	
CookieConsent	CookieConsent	This will remember that you are happy to allow cookies on our website. This cookie is set to expire after 14 days if accepted, or 7 days if declined.	Essential

Cookie	Name	Purpose	More information
_ga	_ga	Used to distinguish users and expires in 2 years	https://support.google.com/analytics/answer/6004245 Not essential
_gid	_gid	Used to distinguish users and expires in 24 hours	
_gat	_gat	Used to distinguish users and expires in 1 minute	
-utma	-utma	This allows Google Analytics to determine unique visitors to our site. The cookie expires 2 years from initial creation or from update of cookie	Not essential
-utmb	-utmb	This cookie is used to establish and continue a user session on our site. The cookie will expire 30 minutes from initial creation of from update of the cookie	Not essential
-utmc	-utmc	This is used in conjunction with the -utmb cookie to determine whether or not to establish a new session for the user. This cookie will expire once you have closed your session with our website (once you have closed your browser)	Not essential
-utmz	-utmz	This cookie is used by google to store where a visitor came from (search engine, search keyword, link). This cookie will expire 6 months from its initial creation or from update of cookie.	Not essential
Vimeo player	Player/vud	We embed videos from our official Vimeo channel. When you press play (or played automatically) Vimeo will drop third party cookies to enable the video to play and to collect analytics data such as how long a viewer has watched the video. These cookies do not track individuals. Expires in 2 years.	Additional tracking can be run from Vimeo. These videos can run Facebook Pixel, Hotjar etc, directly after viewing the Vimeo clip. Essential.

The following cookies will expire after:

ASP.NET_SessionId - Session Only dnn_IsMobile – Session Only

.ASPXFORMSAUTH - Session Only CMSCsrfCookie - Session Only CMSPreferredCulture - 1 Year CMSPreferredRegion - 1 Year CSMCookieLaw - No Expiration VisitorStatus - 20 Years

Any information submitted via the careers section of our website is run by iCIMS. Their policies can be found at https://www.icims.com/legal/privacy-policy-website and https://www.icims.com/legal/terms-of-use

10.2.2   For https://csmretail.com

Cookie	Name	Purpose	More information
_ga	_ga	Used to distinguish users and expires in 2 years	https://support.google.com/analytics/answer/6004245

_gid	_gid	Used to distinguish users and expires in 24 hours	Not essential
_gat	_gat	Used to distinguish users and expires in 1 minute	
visitor_idxxxxx	visitor_idxxxxx	The visitor cookie is composed of a unique visitor ID and the unique identifier for your account. For example, the cookie name "visitor_id12345" stores the visitor value "1010101010", and "12345" is the account identifier. This cookie is set for visitors by the Pardot tracking code.	https://help.salesforce.com/articleView?id=pardot_basics_cookies.htm&type=5
-utma	-utma	This allows Google Analytics to determine unique visitors to our site. The cookie expires 2 years from initial creation or from update of cookie	Not essential
-utmc	-utmc	This is used in conjunction with the -utmb cookie to determine whether or not to establish a new session for the user. This cookie will expire once you have closed your session with our website (once you have closed your browser)	Not essential
-utmb	-utmb	This cookie is used to establish and continue a user session on our site. The cookie will expire 30 minutes from initial creation of from update of the cookie	Not essential
-utmz	-utmz	This cookie is used by google to store where a visitor came from (search engine, search keyword, link). This cookie will expire 6 months from its initial creation or from update of cookie.	Not essential

10.2.3   For www.csmlive.com

Cookie	Name	Purpose	More information
_ga	_ga	Used to distinguish users and expires in 2 years	https://support.google.com/analytics/answer/6004245
_gid	_gid	Used to distinguish users and expires in 24 hours	
_gat	_gat	Used to distinguish users and expires in 1 minute	Not essential

APISID		Google set a number of cookies on any page that includes a Youtube video. While we have no control over the cookies set by Google, they appear to include a mixture of pieces ofinformation to measure the number and behaviour of Youtube users, including information that links your visits to our website with your Google account if you are signed in to one. Information about your use of our website, including your IP address, may be transmitted to Google and stored on servers in the United States.This cookie does not identify you personally unless you are logged into Google, in which case it is linked to your Google account.	https://policies.google.com/privacy
HSID			
LOGIN_INFO			
PREF			
SAPISID			
SID			
SSID			
VISITOR_INFO1_LIVE			
YSC			

visitor_idxxxxx		The visitor cookie is composed of a unique visitor ID and the unique identifier for your account. For example, the cookie name "visitor_id12345" stores the visitor value "1010101010", and "12345" is the account identifier. This cookie is set for visitors by the Pardot tracking code.	https://help.salesforce.com/articleView?id=pardot_basics_cookies.htm&type=5
-utma	-utma	This allows Google Analytics to determine unique visitors to our site. The cookie expires 2 years from initial creation or from update of cookie	Not essential
-utmc	-utmc	This is used in conjunction with the -utmb cookie to determine whether or not to establish a new session for the user. This cookie will expire once you have closed your session with our website (once you have closed your browser)	Not essential
-utmz	-utmz	This cookie is used by google to store where a visitor came from (search engine, search keyword, link). This cookie will expire 6 months from its initial creation or from update of cookie.	Not essential
-utmb	-utmb	This cookie is used to establish and continue a user session on our site. The cookie will expire 30 minutes from initial creation of from update of the cookie	Not essential
external_referer		We use a Twitter widget to deliver live feeds of our latest Twitter posts. These cookies enable us to link with twitter to authorise our use of the widget.	https://twitter.com/en/privacy
twitter_sess			
guest_id			

11   Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

12   You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some

cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Last update: 11 October 2021