

## Free Turn Ltd Privacy Notice

Last updated: 3<sup>rd</sup> April 2024

### **OUR PRIVACY PROMISE**

*Your privacy is important to Free Turn Limited ("we", "us" and "our"). We're committed to protecting your personal data and being transparent about the personal data we hold and use.*

*This privacy notice is intended to be concise, transparent, and easy to understand, but we appreciate that you may have queries or want to seek clarification as to its terms. If you have any queries, please see section 14 for details on how to contact us.*

*We may make changes to this privacy notice from time to time, including where necessary to reflect any changes in the ways in which we process personal data or any changes to data protection laws. Any updates to this privacy notice will be posted on our Cold Tapes Podcast Competition Website. Please check this privacy notice regularly for updates.*

### **1 INTRODUCTION**

- 1.1 This privacy notice applies to you, a user of the Cold Tapes Podcast Competition Website ("**you**" and "**your**").
- 1.2 Please read this privacy notice carefully. Among other things, it explains:
  - 1.2.1 what personal data we may collect about you;
  - 1.2.2 why we collect and use your personal data and the legal bases we rely on for processing it;
  - 1.2.3 who we disclose your personal data to;
  - 1.2.4 where we store your personal data;
  - 1.2.5 how long we keep your personal data; and
  - 1.2.6 your rights regarding the personal data we hold about you and/or which you provide to us.

### **2 WHO WE ARE**

- 2.1 We are Free Turn Limited. We are an entertainment company. Free Turn Limited is a company registered in England and Wales (company number: 12123422) with its registered office at 12 First Floor North, Little Newport Street, London, England, WC2H 7JJ.
- 2.2 Data protection laws apply to our collection and use of personal data and we are a 'data controller' for the purposes of these laws.
- 2.3 If you have any queries regarding this privacy notice or the way in which we process your personal data, please contact us at:

Email: [privacy@freeturn.co](mailto:privacy@freeturn.co)

Address: 12-13 Little Newport Street, London, WC2H 7JJ

### 3 WHAT PERSONAL DATA WE COLLECT

3.1 The type of personal data we process may include (as applicable) the following:

Categories of Data	Description of Data
<b>Identity Data</b>	Name, address, date of birth, age, country of residence and any details contained in copies of identification documents you provide us with.
<b>Contact Data</b>	Email address, home address, social media handle, telephone number.
<b>Financial Data</b>	Bank account details, account number, sort code.
<b>Usage Data</b>	Usage information such as authorisation of your sign state on the website.
<b>Technical Data</b>	Type of device, unique device identifier (e.g. an IMEI number, IDFA, IP, or Mac address), network information, the type of operating system, platform and browser you use, location, time zone settings and other device related information and online identifiers.
<b>Transactional Data</b>	Payment transaction details, account number, sort code, payment amount and any information contained in a payment reference.
<b>Correspondence Data</b>	Information which you provide in, or we learn about you from, any correspondence or communications with us, including details of any enquiries or requests for technical support or customer care support and any other information you provide to us.
<b>Marketing and Communications Data</b>	Your marketing preferences and communication preferences, any information that you may provide to us during the course of the Cold Tapes Podcast competition.

3.2 Information about why we process the above personal data and the lawful basis we rely on is set out in sections 5 and 6 below.

### 4 HOW WE COLLECT YOUR PERSONAL DATA

4.1 We may collect information direct from you and use, disclose and store it when:

- 4.1.1 you access, use or interact on the Cold Tapes Podcast Competition Website at <http://www.coldtapes.com> (the **Cold Tapes Podcast Competition Website**), our platform;
- 4.1.2 you correspond/interact with us via email, social media or other channels;
- 4.1.3 you make any enquiry or complaint;

- 4.1.4 you purchase, request or subscribe for a product or service from us;
  - 4.1.5 you request technical support or other customer care support;
  - 4.1.6 you participate in competitions, surveys and questionnaires or provide us with a review or feedback;
  - 4.1.7 you provide data for other legal and regulatory purposes; or
  - 4.1.8 you post content on our social media pages or any of our other channels.
- 4.2 Where lawful, we may also obtain personal data from other third parties (including third party platforms) and we may process that information where such processing is necessary or permitted in order to provide our products and services to you, or where such processing is necessary or permitted for our internal administrative purposes or for marketing and business development purposes.
- 4.3 We may also automatically collect certain Technical Data (as defined in section 4 above) relating to your device and your activities on the Cold Tapes Podcast Competition Website. We may also collect such data from third parties such as analytics providers (including Google) and third party platforms and organisations within advertising networks (including Facebook).
- 4.4 Where we need to collect personal data by law, or under the terms of an agreement we have with you, and you fail to provide that data when requested (or fail to consent to the processing of that data, if necessary), we may not be able to perform the agreement or arrangement we have or are trying to enter into with you or such failure may limit or prevent you obtaining access to our products and services.

## **5 HOW WE USE YOUR PERSONAL DATA**

- 5.1 We use your data for the purposes of:
- 5.1.1 administering the Cold Tapes Podcast Competition;
  - 5.1.2 responding to enquiries and, or complaints;
  - 5.1.3 taking payment; and
  - 5.1.4 issuing refunds.
- 5.2 We may process your personal data where such processing is necessary or permitted:
- 5.2.1 to comply with any applicable law or regulation; and/or
  - 5.2.2 for the purposes of the legitimate interests pursued by us or a third party. These legitimate interests include the purposes identified in the table below in section 6 but may also include other commercial interests and our internal administrative purposes. Where we rely on legitimate interests as the lawful basis for processing your personal data, we'll put in place appropriate safeguards to protect your data and to ensure that your interests or fundamental rights and freedoms are not overridden by those legitimate interests.
- 5.3 We may also process your personal data where we have your consent. Where we rely on consent as the lawful basis for processing your personal data, you have the right to

withdraw your consent at any time and if you wish to do so, you should contact us using the contact details set out in section 14 below. Where we obtain your consent to send you marketing communications, you can unsubscribe by following the unsubscribe link within the communication. The withdrawal of consent does not affect the lawfulness of processing based on consent before withdrawal or the lawfulness of processing based on other lawful grounds.

- 5.4 We may process your personal data for more than one lawful ground depending on the specific purpose for which we're using your data.
- 5.5 We may process your personal data ourselves or in conjunction with our third party service providers in accordance with section 8.
- 5.6 We'll only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.
- 5.7 If we need to use your personal data for an unrelated purpose, we'll notify you (which may be by way of update to this privacy notice) and we'll explain the legal basis which allows us to do so.
- 5.8 Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

## 6 OUR LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA

- 6.1 We've set out below the legal bases on which we process your personal data. We've identified what our legitimate interests are, where appropriate.

Purpose/Activity	Type of Personal Data Processed	Lawful Basis for Processing
<b>Registration</b> <ul style="list-style-type: none"> <li>• To register you as a new user</li> <li>• Administration purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Correspondence Data</li> <li>• Technical Data</li> <li>• Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Performance of a contract</li> <li>• Compliance with a legal obligation</li> <li>• Our legitimate interests to operate our business and fulfil our legal and contractual obligations</li> </ul>
<b>Provision of our products and services</b> <ul style="list-style-type: none"> <li>• To provide our products and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transactional Data</li> <li>• Correspondence Data</li> <li>• Usage Data</li> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Compliance with a legal obligation</li> <li>• Our legitimate interests to operate our business and fulfil our legal and contractual obligations</li> </ul>
<b>Marketing and Advertising</b>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Our legitimate interests to develop our business [and to</li> </ul>

Purpose/Activity	Type of Personal Data Processed	Lawful Basis for Processing
<ul style="list-style-type: none"> <li>To enable you to take part in a prize draw or competition including the publication of certain details if you're the winner.</li> </ul>	<ul style="list-style-type: none"> <li>Marketing and Communications Data</li> <li>Usage Data</li> </ul>	inform our marketing strategy]

## 7 HOW WE SHARE YOUR PERSONAL DATA WITH OTHERS

- 7.1 We won't share any of your personal data with third parties except as set out in this section or otherwise notified to you or agreed between you and us from time to time.
- 7.2 We may share personal data with our group companies (including our subsidiaries, ultimate holding company and its subsidiaries) and partnered companies for the purposes outlined in this privacy notice. We may also share personal data with third party service providers who we engage to provide services which facilitate our business and we may also need to share personal data with other third parties in order to comply with our legal and regulatory obligations. Below is a list of specific third parties and other categories of third parties with whom we may share your personal data:
- 7.2.1 online marketing tools and other analytics, advertising and attribution partners;
- 7.2.2 Third party platforms;
- 7.2.3 Financial Institutions, payment system operators, payment service providers and other financial service companies; and
- 7.2.4 Any similar or replacement third parties from time to time.
- 7.3 We ensure that any third party engaged by us who processes your personal data in connection with the purposes listed above has policies and procedures in place to ensure compliance with data protection laws.
- 7.4 For any third parties that are based, or process data, outside of the EEA or the United Kingdom, we engage such third parties in accordance with section 8 below.
- 7.5 We'll remain the controller responsible for the processing of your personal data even if a third party may operate as a joint controller with us. For some processing activities we may act as a processor for a third party and, in such circumstances, the third party will be responsible for providing you with the processing information required under data protection laws.
- 7.6 We may share your personal data with third parties where we're required to do so by law or regulation (such as in connection with an investigation of fraud or other legal enquiry) or in connection with other legal proceedings (including where we believe that your actions violate applicable laws or any agreement with us [including our terms of service]).
- 7.7 In the event that our business or any part of it is sold or integrated with another business, your details may be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

## **8 INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA**

- 8.1 From time to time it may be necessary for us to transfer your information internationally. In particular, your information may be transferred to and/or stored on the servers of third parties identified in section 7 which are based outside of the UK or the EEA.
- 8.2 However, we won't transfer your personal data outside of the UK or the EEA unless:
- 8.2.1 such transfer is to a country or jurisdiction which the EU Commission or the UK (as applicable) has approved as having an adequate level of protection;
  - 8.2.2 appropriate safeguards are in place in accordance with data protection laws. These safeguards include the use of standard contractual clauses or binding corporate rules; or
  - 8.2.3 the transfer is otherwise allowed under data protection laws (including where we have consent or the transfer is necessary for important reasons of public interest, is necessary for the establishment, exercise or defence of legal claims or is necessary for the performance of a contract with the data subject).
- 8.3 We'll ensure that where your personal data is transferred outside of the UK or the EEA, it is afforded on essentially equivalent level of protection as would be afforded to it within the EEA or UK.

## **9 HOW WE STORE YOUR PERSONAL DATA**

- 9.1 As a minimum, we need to store your personal data for as long as is necessary to enable us to fulfil the purpose for which it is processed, including to fulfil our legal and regulatory obligations (e.g. relating to record keeping) and to exercise or defend any legal claims.
- 9.2 We'll notify you without undue delay in accordance with the requirements of data protection laws, if we have reason to believe that there has been a personal data breach by us which could adversely affect your rights and freedoms and we're required by law to notify you.

## **10 YOUR LEGAL RIGHTS**

- 10.1 Subject to any conditions and requirements set out in data protection laws, you may have some, or all, of the following rights in relation to the personal data we hold about you:
- 10.1.1 the right to request a copy of your personal data held by us;
  - 10.1.2 the right to correct any inaccurate or incomplete personal data held by us;
  - 10.1.3 the right to request that we erase personal data we hold about you;
  - 10.1.4 the right to request that we restrict the processing of your data;
  - 10.1.5 the right to have your personal data transferred to another organisation;
  - 10.1.6 the right to object to certain types of processing of your personal data by us; and
  - 10.1.7 the right to complain (please see section 14 of this privacy notice).

10.2 **PLEASE NOTE** that these rights are not absolute in all situations and may be subject to conditions and provisions set out in data protection laws. We cannot, therefore, guarantee that we'll be able to honour any request from you in connection with the rights set out above. (For example, even if you request that we delete your personal data, we may be required by law to retain some personal data for accounting and record keeping purposes or in order that we comply with our legal and regulatory obligations).

10.3 For further information, or to exercise any particular right, please see section 14 for details of how to contact us.

## 11 LINKS TO THIRD PARTIES

11.1 The Cold Tapes Podcast Competition Website may link or redirect to other websites, social media accounts or other content which is not under our control. Unless otherwise stated, such links or redirections are not endorsements of such websites or representation of our affiliation with them in any way and such third party websites are outside the scope of this privacy notice.

11.2 If you access such third party websites or platforms, please ensure that you're satisfied with their respective privacy policies before you provide them with any personal data. We cannot be held responsible for the activities, privacy policies or levels of privacy compliance of any website or platform operated by any third party.

## 12 COOKIES

The Cold Tapes Competition Website uses session cookies to authenticate users sign in state on our website.

## 13 QUESTIONS AND COMPLAINTS

13.1 Please contact us at:

**Email:** [privacy@freeturn.co](mailto:privacy@freeturn.co)

**Address:** 12-13 Little Newport Street, London, WC2H 7JJ

13.2 You have the right to make a complaint at any time to the relevant supervisory authority for data protection issues, which in the UK is the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)).

## 14 DETAILS OF CHANGES TO THIS PRIVACY NOTICE

Version	Date	Details of changes
1.0	03/04/2024	First published.