



## Privacy Notice

The Rouge Partnership Ltd t/a Rouge Events  
Registered Office - 8 Twistleton Court, Priory Hill,  
Dartford, Kent, DA1 2EN.  
Company registration no. 4330374  
ICO Registration: ZA 927648

Our Data Protection representative Nathan Homan  
can be contacted by email on: [nathan@rouge-events.com](mailto:nathan@rouge-events.com)

This privacy notice describes how we collect, use and store personal information about you during and after your business relationship with us, in accordance with the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR).

Rouge Ltd is a data controller. This means that we are responsible for deciding how we hold and use and store personal information about you. We are required under the DPA 2018 / UK GDPR to notify you of the information contained in this privacy notice.

We may update this notice at any time. If relevant (and feasible), we will notify you.

It is important that you read this notice, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information.

### DATA PROTECTION PRINCIPLES

We will comply with all relevant data protection law (including the DPA 2018 / UK GDPR). This requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## THE KIND OF INFORMATION WE COLLECT AND HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified, whether directly or indirectly. It does not include data where an individual cannot be identified (anonymous data).

We collect personal data across the business – this is limited to full name, job title and email address for suppliers, clients, and attendees at virtual events held on the Welcome platform.

This personal data is collected primarily through enquiries from our website (www.rouge-events.com) and guest lists from clients of individuals who have pre-registered for virtual events on the Welcome platform, of which we are producers of.

This personal data is shared with external organisations who support our business operation. These organisations include:

- Microsoft Office 365
- Dropbox
- Xero accounting software
- Welcome – a virtual events company, whose Privacy Notice can be viewed [here](#).

Personal data is stored on our Microsoft Office 365 server. Access to personal data on this is permission-based and is stored in the UK and EU, therefore is covered by the existing adequacy agreement.

The exception to this is when data is shared with Welcome, our processor for client guests / attendees. Welcome are US-based, so personal data will be transferred outside of the UK / EEA. In this instance, we utilise Standard Contractual Clauses as the legal transfer mechanism. Detail of this processor arrangement are in this Privacy Notice.

## HOW WE WILL USE INFORMATION ABOUT YOU

### As a Data Controller:

We need all the categories of personal data detailed above to allow us to conduct our business operation. Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you are a client or supplier, then we will need to process your data in line with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below.

- Administration of a contract we have entered with you and providing our products and services to you.
- Business management and planning, including accounting and auditing. In these instances, we will share your personal data with our accountants and associated reporting platforms.
- Planning for the on-boarding or termination of our contracting relationship.
- Dealing with legal disputes involving you, or any disputes that may arise under the contract that we have with you or the way in which we provide our products and services to you.

**For the Client's guests / attendees:**

Personal data will be collected either from our Clients or the data subject directly to create an account with our processor who hosts the Client's online event on the processor's platform.

We have engaged with Welcome, an online events platform as our processor. We acknowledge that Rouge Events are acting on your behalf as processor. The EU contractual clauses are in place to ensure the transfer of personal data outside of the UK and EEA fall within the prescribed requirements.

**HOW INDIVIDUALS CAN ACCESS, RESTRICT, OBJECT TO AND ERASE THEIR PERSONAL DATA**

A request can either be made directly to us by email: [nathan@rouge-event.com](mailto:nathan@rouge-event.com) or an attendee can direct their request to the platform provider, Welcome: [support@experiencewelcome.com](mailto:support@experiencewelcome.com). Further information regarding Welcome's Privacy Policy can be also be found here: [www.experiencewelcome.com/privacy-policy](http://www.experiencewelcome.com/privacy-policy).

Regarding our processor, we have put in place that the data subject's personal data is deleted within 30 days after the event, unless otherwise requested by the client or the data subject can request directly from Welcome to have their personal data deleted.

### **Reasonable Expectance of Processing:**

It would be reasonable for a data subject to expect the data collected to either manage their contractual relationship with the client or to set up the access account if attending an event.

### **Control over the Data:**

A limited personal data is collected for control purposes. Some personal data elements are optional. To keep control of the personal data on the processor's platform, an automatic deletion is inserted.

### **Data Retention:**

As processor, we have included an automatic deletion of personal data from the sub-processor within 30 days after the event unless indicated otherwise from yourselves.

## **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

- We will retain details of registrants and business enquirers for a period of 7 years, after which time it will be anonymised. If you ask us to remove your data from this, we will do so immediately.
- If you are an active client of the business, we will retain your details on file for a period until the end of our business relationship, plus 2 years.
- We will retain information relating to invoicing for a period of 7 years, including the current accounting year to satisfy HMRC requirements.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE & RESTRICTION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **Your Rights:**

- **Subject Access Request** – this enables you to receive a copy of the personal information we hold about you. To action this request, please email the data protection contact: [nathan@rouge-events.com](mailto:nathan@rouge-events.com). We require a suitable form of identification and under normal circumstances, we will supply this to you within one calendar month of your request and of identification being received. No fee is usually payable; however, we may apply an appropriate fee if the request is deemed to be excessive, or repetitive.

- **Request Correction** – this enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request Erasure** – this enables you to delete or remove personal information when there is no good reason for us to continue processing it.
- **Object to Processing** – in certain circumstances, you have the right to request we suspend the processing of your data. Please contact us if you require more information on this.
- **Request the Transfer** – you have the right to request the transfer of your personal data to a third party. Please contact us if you require more information on this.
- **Right to Withdraw Consent** – where we rely on consent to process your data, you have the right to withdraw this at any time, without giving reason. To withdraw your consent, please contact the data protection officer. Once received, we will not process your data for the reasons you have agreed to, unless we have another legal basis for doing so.
- **Right to complain** – you have the right to complain at any time to the Information Commissioners’ Office (ICO) regarding data protection issues - <https://ico.org.uk>

We reserve the right to update this privacy notice at any time. If you have any questions about it, please contact us at [nathan@rouge-events.com](mailto:nathan@rouge-events.com)

**Last updated: April 2021.**