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## **Totem Privacy Policy** **September 2021 - Version 1.04**

### **Introduction**

The Totem Hybrid Virtual Events Platform ('Totem'), provided by Bridge Event Technologies Limited ('Bridge'), respects your privacy and are both committed to protecting your personal data. The privacy policy below tells you about how we look after your personal data when you access and use Totem and tells you about your privacy rights and how the law protects you.

### **1. Important information and who we are**

#### **Purpose of this privacy policy**

This privacy policy aims to give you information on how Totem and Bridge collects and processes your personal data through your use of Totem (and all related web sites, applications and online services and tools where this policy is referenced, regardless of how you access or use them, including mobile devices) and including any data you may provide through Totem.

It is important that you read this privacy policy combined with any other privacy policy or fair processing policy we may provide on occasions when we are collecting, or processing, personal data about you, so that you are fully aware of how and why we are using your data.

This privacy policy is in addition to other notices and privacy policies and is not intended to override them.

#### **Processor**

Totem is the 'processor' in respect to certain uses of your personal data (collectively referred to as Totem, "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for working with the event organisers who use the platform, regarding questions in relation to this privacy policy.

If you have any questions about this or the organisers privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

- Full name of legal entity: Bridge Event Technologies Limited
- Email address: [help@totemhybrid.com](mailto:help@totemhybrid.com)



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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](http://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.

### **Changes to our privacy policy and your duty to inform us of changes to your personal data**

We keep our privacy policy under ongoing review. It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes to your personal data during your relationship with us.

### **Your access to and use of third-party websites or services accessible through the Totem Platform**

Totem includes links to third-party websites and applications as well as to partner providers of multiple different types of services associated with a specific event.

### **Third party web sites and applications**

Clicking on links to third party web sites, content or applications may allow those third parties to collect or share data about you. We do not control those third-party websites or content and are not responsible for their privacy statements or the way in which they collect or use your data.

Where you access or use third party services provided by an Event Organiser, advertiser, sponsor or any other party who attends an Event, we encourage you to request details of and read the privacy policy of that party. We do not control those third parties and are not responsible for their privacy statements or the way in which they collect or use your data.

**We will never share your data with any third-party service provider whether online or offline without your express permission.**

### **Please Note:**

We are a platform provider. Totem is made available to you to attend like any other offline event, we do not engage in any correspondence, or the relationship, between you as a user of Totem or attendee at any event and any services you make use of which are made available to you as part of your access to the Totem platform or an event (except where it is provided directly by Totem to you).

In particular we do not participate in any part of any service or any contract for services which may be provided to you by any other party at any event or any event organiser or otherwise available to you as a user. You accept all responsibility in respect to ensuring that any specific services which you make use of are suitable for you.

## **2. The data we collect about you**



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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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** which includes your image and first name, last name, username or similar identifier, title. This may also include other audio-visual content which you appear in as you contribute to or interact with an event.
- **Contact Data** which includes your email address and telephone numbers.
- **Technical Data** which includes your internet protocol (IP) address, your login data, browser type and version, hardware information, time zone setting and location, browser plug-in types and versions, operating system and website, and other technology on the devices you use to access Totem.
- **Profile Data** which forms the Badge Builder upon registration to Totem. This includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses and email address.
- **Usage Data** which includes information about how you use Totem, products and services.
- **Marketing and Communications Data** which includes your preferences in receiving marketing from us and our third-party Platform Partners and your communication preferences.

We also may collect, use and share Aggregated Data such as statistical or demographic data for any purpose. **Aggregated Data** could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

We don't keep personal information for longer than is necessary. While we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security. If necessary, we may retain your personal information for our compliance with a legal obligation or in order to protect your vital interests or the vital interests of another natural person.

### **If you fail to provide personal data**

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, we may not be able to perform the agreement we have or are trying to enter into with you (for example, to provide you with access to Totem, or a specific event itself and particular services).

### **3. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity, Contact and other Data by filling in forms or by corresponding with us by email or otherwise on Totem. This includes personal data you provide when you: (a) create an account and register via Badge Builder with us; (b) subscribe (or are subscribed) to our services or interact in an event; (c) request marketing to be sent to you; (d) enter a promotion or survey; or (e) give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with Totem, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

#### 4. How we use your personal data

##### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a user of Totem	(a) Identity (b) Contact	Performance of a contract with you
To process any paid entry to an event if applicable: (a) Communicating with you, for example sending you confirmation of your attendance for an event.	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: (a) Providing access to Platform services (b) Notifying you about changes to our terms or privacy policy (c) Asking you to leave a review or take a survey (d) Investigating complaints	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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 and to study how users use Totem and associated products/services)
To administer and protect our business and our services (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, administering our CRM, 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 enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how users use Totem and to develop and grow our business)
To deliver relevant platform content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how users use Totem and to grow our business and inform our marketing and growth strategy)
To use data analytics to improve our Platform, products/services, marketing, user and Partner relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for certain platform services and to keep our services and web site updated and relevant, to develop our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To make suggestions and recommendations to you about Events or other services available through Totem that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop the products and services available through Totem)
To provide event organisers with usable data for marketing purposes to share with their sponsors and exhibitors	(a) Identity (b) Contact (c) Usage (d) Profile (e) Sales and Marketing	Totem shares user data for the purposes of marketing with the event organiser who then in turn may share information under their own privacy policy with exhibitors or sponsors for the purpose of marketing.

- Where we need to perform the contract we are about to enter into or have entered into with you (e.g. to provide you with access to the functionality of Totem).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Recommendations from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think may be of interest to you. This is how we decide which services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us previously used services or purchased products or services through the Totem Virtual Events Platform and you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.



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## Opting out

You can ask us or third parties to stop sending you marketing messages at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your use of the Totem Virtual Events Platform or any associated services.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our platform may become inaccessible or not function properly.

## Change of purpose

We will 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

**Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.**

## 5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table "Purposes for which we will use your personal data" above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

Where third parties provide events or support the provision of services made available to you through Totem, these third parties may receive certain personal data from you. Whilst we are not in control of any third parties to whom you request your data to be shared, we require all third parties to respect the security of your personal data and to treat it in accordance with the law.

To help constantly improve and tailor the service we provide to you through our platform, we may use aggregated information so that we can administer and improve our services, analyse trends, gather broad demographic information and most importantly monitor and improve our operations on a day to day basis. In carrying out this activity, we may pass some information to third parties in aggregate and



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anonymised format.

## Your disclosure to third parties

Except as otherwise expressly included in this Privacy Policy, this document addresses only the use and disclosure of information we collect from you. If you disclose your information to others, different rules may apply to their use or disclosure of the information you provide to them. Totem does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. We encourage you to ask questions before you disclose that personal information to others.

## 6. International transfers

We may transfer your personal data outside the European Economic Area (EEA) in our performance of services.

Whenever we transfer your personal data out of the EEA, we ensure an appropriate degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or



reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we keep the data in-line with the event organisers policy of retention, if an organiser fails to renew their services with Totem, the Totem privacy policy will retain user data for 6 months before either archiving or deleting that data as it has been deemed no longer needed.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain



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products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, we may forward this request to the event organiser to confirm the removal of the data or provide the data request submitted under the rights of the user.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

If you exercise any of your rights under data protection law, the event organiser you are dealing with must respond as quickly as possible. This must be no later than one calendar month, starting from the day they receive the request.

## **10. Glossary**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. In respect to Totem, that is the performance of our agreement with you to make the platform and its services available. We are not involved in the processing of your Personal Data during any engagement you enter into with our third-party partners. We will always get your consent to transfer any Personal Data to any third party whom you enter into an agreement with for the provision of their services to you.



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**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### External Third Parties

- Service providers acting as processors who provide our IT and system administration services.
- Providers of our cloud services such as AWS and Google.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Our third-party partners and affiliates who you engage with through the use of the Totem in order to facilitate the provision of services.

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