



PRIVACY POLICY

JPS Studios is committed to protecting and respecting your privacy. This Privacy Notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The Website (<https://www.jampadspace.com>) is operated by JamPadSpace Studios Limited (we, us, our, JPS Studios, JPS), a company incorporated in England & Wales. Where we decide the purpose or means for the processing of the personal data that you provide when using our service, we are the “data controller” for the purposes of the GDPR. As a data controller, we will comply with all applicable data protection laws. This Notice should be read together with our Terms & Conditions.

JPS Studios uses UK GDPR as the main framework for the administration and processing of all personal data, except:

- where national, federal, state or city regulations are of a higher requirement than UK GDPR; or
- where national, federal, state or city regulations require a separate control or processing of personal data not covered in UK GDPR guidelines.

We are registered with the ICO (UK Information Commissioner's Office) - number *****.

Our Website may contain hyperlinks to third-party websites. These websites fully operate independently from us and we cannot accept any responsibility or liability for the privacy practices of such third parties nor the availability of these external sites or resources. The appearance of such links on our Website is not an endorsement. Should you use any of these websites, such use is at your own risk and we would recommend that you review their respective privacy policies. If you have any questions or comments about this Privacy Notice, please let us know by emailing JPS.

WHAT PERSONAL INFORMATION ARE WE LIKELY TO COLLECT ABOUT YOU?

In order to enable you to book any studio sessions in any of our studios via the Website or otherwise, we will need to collect and process information about you and the guests you may bring to your session.

INFORMATION PROVIDED BY YOU

When you use our Website, you will be asked to fill in forms to create your own account.

We will ask you to provide us with the following information:

- your first and last name
- your artist name (optional)
- your email address
- telephone number

If you decide to make a reservation, we will also ask you to provide:

- your payment card details
- your billing address
- a copy of your identification documents which includes relevant ID documentation and a photograph. All identification documents are deleted after 3 years from the identification system. A securely hashed copy of the document number used is stored for a longer period, in line with other personal data retention policies.
- The first and last name of the pre authorised guests you are bringing to the session with you. These are deleted within 30 days of the booking unless required to investigate a breach of the conditions stipulated in this document.

FINANCIAL TRANSACTIONS

All financial transactions via our Website are handled directly by our payment service provider, Stripe. We only share that information as is necessary to conclude the transaction and will not share any personal information with this third-party provider, nor will we receive the financial information that you provide to them except for the last four digits of your payment card.

HOW DO WE USE YOUR PERSONAL DATA AND ON WHAT BASIS?

When you visit our Website, whether to browse our content or make a reservation (the Service), we may use the personal information that you provide for the following purposes:

- Processing:** Account creation & administration
- Purpose:** To enable you to use the Service, to contact you with information about your account and the Service, to enable you to make reservations and to enable you to raise support queries.
- Lawful Basis:** To allow us to perform our Service contract with you.
- Processing:** Transactional correspondence
- Purpose:** To notify you that your registration for an account is successful, and to provide information in relation to your use of the Service, including confirmation of reservations.
- Lawful Basis:** To allow us to perform our Service contract with you.
- Processing:** ID verification
- Purpose:** To confirm your identity when registering for an account. Ensure persistent uniqueness of a digital account.
- Lawful Basis:** Legitimate interests of our own or of third parties to operate our business
- Processing:** Customer support
- Purpose:** To respond to your support queries.
- Lawful Basis:** To allow us to perform our Service contract with you.
- Processing:** Service usage monitoring (including Analytics)
- Purpose:** To monitor the performance of the Service, identify errors, and improve the Service.
- Lawful Basis:** Legitimate interests of our own to operate our business
- Processing:** Fraud investigation and prevention
- Purpose:** To safeguard the service and our users in the short and long term.
- Lawful Basis:** Legitimate interests in administering and monitoring use of our studios by all guests and individuals and/or preparation to perform or performance of a contract (whether booked by you or by another person for your benefit) to provide and administer the booked studio facilities

- Processing:** Lead Generation
- Purpose:** To market the Service to prospective customers and business partners.
- Lawful Basis:** Legitimate interests of our own or of third parties to operate our business

- Processing:** Marketing
- Purpose:** To market the Service to prospective customers and business partners.
- Lawful Basis:** Legitimate interests of our own or of third parties to operate our business

- Processing:** Targeted Marketing
- Purpose:** To understand your interests so that we can render more relevant advertisements to you through online advertising platforms including social media.
- Lawful Basis:** Consent. Where we rely on legitimate interests as a lawful basis for processing your personal data, we will always consider whether or not our interests are overridden by your rights and freedoms.

- Processing:** The usage of stored payment card details for payments post booking.
- Purpose:** To safeguard the service and our users in the short and long term.
- Lawful basis:** Based on performance of contract and JPS legitimate interests in preventing theft, fraud and damages.

DO WE SHARE YOUR PERSONAL INFORMATION WITH ANYONE ELSE?

We will only ever share your information with third parties in the ways that are described in this Privacy Notice.

PERSONNEL, SUPPLIERS AND SUBCONTRACTORS

We keep your information confidential but may disclose it to our personnel (including personnel in our group companies), suppliers or subcontractors (including our cloud-based data processing, data analytics and payment service providers) insofar as it is reasonably necessary for the purposes set out in this Privacy Notice, provided that they do not make independent use of the information. In some instances, this data sharing may involve the transfer of information outside the UK and EU. Please see our section on International Data Transfers below.

If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, the information we hold may be included as part of that sale, in which case you will be notified via email and/or a prominent notice on the Website of any changes in ownership or use of your information, as any choices you may have regarding that information. By group company, we mean our subsidiaries, our ultimate holding company and its subsidiaries, as defined with reference to the definitions of "holding undertaking" and "subsidiary undertaking" in section 1162 of the UK Companies Act 2006. We will not pass your information on to third parties for marketing purposes unless you have provided your consent, in which event the advertisements that appear when you visit our Website will be targeted to provide you with more relevant advertising content and you may receive communications from third parties offering similar or related services to us.

YOUR CHOICES AND RIGHTS IN RELATION TO PERSONAL DATA WHICH WE PROCESS RELATING TO YOU

You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one calendar month at the latest:

- The right to be informed about how we process your data
- The right of access to your data
- The right to rectification of any inaccuracies
- The right to erasure

- The right to restrict processing
- The right to data portability
- The right to object to processing
- Rights in relation to automated decision making and profiling.

To make a request in relation to any of the aforementioned rights, please email us at JPS. You are under no statutory or contractual obligation to provide any of your personal data to us. However, if you do not provide the personal information requested, we will not be able to provide you with the services that we offer.

GDPR DELETION REQUEST

Within your right to erasure, you can request that we delete your personal data. Subject to the matters outlined below, your personal data will usually be deleted from our booking and payment systems within one calendar month of our receiving your request. CCTV footage and the details of guests provided by a lead booker are usually purged and deleted every 31 days or sooner unless we need to retain the footage for investigation of crimes, fraud or for other legitimate reasons.

Please note that we will not delete all your details if we have lawful grounds for retaining that personal data. For example, if your account has been banned for breaching any of our usage policies. We will retain access to your identity documents for 3 years from when they were first submitted and also a record of your Email, Phone number and payment fingerprint. These measures are to prevent a repeat sign up by breaching and/or fraudulent users and to protect our wider customer base." We may determine other reasons for, and periods of, retention of personal data - even where you have made a valid deletion request. Any such retention of your data will be in accordance with the applicable data protection laws. Please contact JPS if you have any questions or concerns about the ongoing retention of your personal data.

COMPLAINTS

If you are unhappy with the way that we are processing your personal data or if you'd prefer not to receive certain marketing information or limit the use of your personal information to a particular purpose, please let us know. The best way to bring this to our attention is by emailing us at JPS.

To make a complaint to a data protection regulator, you may contact them at <https://ico.org.uk/make-a-complaint/> in the UK or contact your national or federal data protection board in your specific country.

CHILDREN

We do not knowingly use the Website to solicit data from or market to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information or may be receiving communications from us without the consent of a parent or guardian, we ask that this be brought to our immediate attention. We will make it our priority to address this situation and delete information relating to a child as soon as practicable. In such an event, please contact us at JPS

SECURITY

We will take appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of our Website and services. All information you provide to us is stored on our secure servers. Please be aware that, while we take the security of our Website and your personal information as a high priority, no security system can prevent all security breaches.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

RETENTION

In accordance with data protection laws and good commercial practice, we do not retain data in a form that permits the identification of the person(s) to whom it relates for any longer than is necessary. Once the purpose for which information has been collected has been fulfilled, we will either permanently delete your personal information or remove all identifiers within it so that it is no longer personal data.

We may use such anonymised data for research and/or business analysis purposes. Where you have provided us with personal information in order to set up an account with us, we will retain those details for as long as your account remains active. Where we obtain your personal data in relation to the use or purchase of our services, including VAT or invoicing information, we are obligated by law to keep this for a minimum of six years.

INTERNATIONAL DATA TRANSFERS

Our servers are located in the European Union and the information that we collect directly from you will be stored in these servers. We may also transfer your personal data to our third-party service providers, many of whom may be located outside of the UK and EU, operate from multiple locations including non-EU based operations or engage sub-processors located outside the UK and EU, including Postmark (based in the US).

CHANGES TO THIS NOTICE

This Notice may be updated from time to time. We will notify you of any changes to our Notice by posting the new Notice on our Website. You are advised to consult this webpage regularly for any changes to the Notice.