# **PRIVACY POLICY**

# **Collection and Disclosure of Personally Identifiable Information**

This privacy policy (Privacy Policy), together with the Terms of Use in relation to this Site, sets out the basis on which any personal data that 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 it will be treated.

We value the relationship we have with you, and we are committed to responsible information handling practices. We take your privacy very seriously and want you to feel comfortable whenever you visit the Site or provide us with your personal information. If you do not accept the terms of this Privacy Policy, then you must stop using or accessing the Site.

# **Statement of GDPR Compliance**

All data is gathered and processed in accordance with data protection legislation, including the EU's General Data Protection Regulation (GDPR), effective May 2018, and future implementing legislation in Ireland.

## **Identity of Data Controller**

Silk Road ON DEMAND hereinafter referred to as SROD operates as a Data Controller, determining the purposes and means of processing personal data. SROD can be contacted during normal business hours, 9:30am to 5:30pm Monday through Friday except holidays, by emailing info@silkroadfilmfestival.com.

### **Legal Basis**

SROD gathers and processes personal data on the basis of consent. Your information is used only to send you the information about SROD which you have agreed to receive, to complete transactions in the manner consented to by you and to improve your experience on our website via cookies. Consent for these operations may be withdrawn at any time.

## **NOTICE OF INFORMATION PRACTICES**

We collect two types of information about our users: (1) personally-identifiable information provided by you as well as information we learn about you from your use of our services and the Site; and (2) aggregate information that cannot be used to identify a particular visitor (see "Cookies" section below).

We collect personally-identifiable information about you only when you specifically provide such information to us (for example, when you register for the SROD by completing the registration form, when you complete the film submission form and/or when you purchase a ticket through the Site, or onsite at a physical location subscribe to our newsletter). We may also securely collect information relating to the transactions you carry out, including details of debit or credit cards that you use. We will not disclose this information to third parties except as required to provide services to you, to carry out the transactions you have requested, to operate the Site, or as required by law or any court of competent jurisdiction.

We, or third parties specifically selected by us, may use your information for the following purposes:

- Ensuring that the content of the Site is presented in the most effective manner for you and for the device which you are using to access the Site.
- Providing you with information or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

Notifying you about changes to the Site or our services, where applicable

### PROTECTING YOUR PERSONAL INFORMATION

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 the Site. Any transmission of data is at your risk.

We recognise industry standards and employ security safeguards to protect personally identifiable information from unauthorised access and misuse. All information you provide to us is stored on secure servers. We will not disclose to third parties any personally identifiable information that you provide without your consent, except as necessary to provide services you have specifically requested. Once we have received your information, we will use industry standard procedures and security features to try to prevent unauthorised access to that information.

### **COMMON WEB TECHNOLOGIES**

We employ common web technologies that help to manage the Site, among them: **Cookies** 

A "cookie" is a name for tokens of information that the Site may provide to your web browser, which is used only by the Site while you are at that website. The Site uses cookies for a variety of purposes. Cookies are used to help us better understand website usage in the aggregate to ascertain which areas of the Site users prefer. We also use cookies to simplify your data entry for certain online forms. If you simply want to browse, you do not have to accept cookies from the Site. If you decide, however, that you would like to register and log in to special areas of the Site, and you have modified your browser settings not to accept cookies, you will need to re-set your browser to accept the cookies that are sent to it. Otherwise, you may not be able to participate in certain areas of the Site. Most browsers are by default set to accept and maintain cookies.

SROD contracts a third-party data processor, whose activities include the use of third party cookies to create remarketing audiences for the Festival on other digital platforms. This means that personal data obtained via cookies may be automatically processed in order to advertise to you online. The information obtained via cookies is kept as minimal as possible and is processed only as necessary for the tasks listed above. This processing includes the use of Google features such as Google Tag Manager and Google Analytics and Facebook features such as Facebook pixels and custom audiences. In this case, personal data maybe be held and processed for a maximum of ten months.

### **Website Usage Data**

With or without cookies, the Site keeps track of usage data, such as the source address that a page request is coming from (i.e., your IP address and domain name), date and time of the page request, the referring website (if any), and other parameters in the URL (e.g., search criteria). We may use this data to better understand website usage in the

aggregate to determine which areas of the Site users prefer (e.g., based on the number of visits to those areas), and we may make this aggregated information available to third parties as part of our business. This information is stored in log files and used for aggregated and statistical reporting. It is not attributed to you as an individual.

### **Links to External Sites**

This Privacy Policy only applies to the Site. Although the Site may provide links to websites of third parties, such as those of our business partners and online advertisers, this Privacy Policy does not apply to any other website that you connect to from the Site. You must read their privacy policies to understand how they manage personal information. Although we choose our partners and sponsors carefully, we are not responsible for the content or practices of websites operated by third parties that are linked to or from the Site. These links are provided as a service to users of the Site. Unless otherwise stated, they do not constitute any endorsement, sponsorship or approval of their Content, policies or practices.

### DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to our sponsors, our subsidiaries, our holding companies and their subsidiaries.

We may disclose your personal information to third parties in the following circumstances:

- o In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If all or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- o If we are under a duty to disclose or share your personal data in order to: (a) comply with any legal obligation; (b) enforce or apply the Terms of Use and/or any other agreements; or (c) protect our rights, property or safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

# **How Your Data is Used**

SROD uses personal data for the purposes of communications, improving the user experience on our website, marketing and processing payments. Data regarding a person's accessibility requirements may be collected during the ticket purchase process in order to provide for persons with disabilities at Festival events.

SROD occasionally utilises automated decision-making in its data processing activities to reach target markets of digital users who may be interested in SROD programming and activities, particularly on social media. Data subjects may opt out of this use at any time.

Personal data is held and processed until such time as you communicate to SROD in writing that you wish for it to be removed. Data is retained by the Festival at the company registered address

in Ireland except where collection and processing is facilitated by third party data processors. The Festival contracts with trusted third parties in order to provide exceptional services which the Festival is not able to offer. Examples of authorised third party data processors include MailChimp, Ticketsolve and Ticket Tailor.

SROD never sells or rents personal data to any third parties and will not share your personal information with an unauthorised third party unless required to do so by law.

MailChimp processes data in the United States and adheres to the EU-U.S. Privacy Shield framework, which certifies the responsible and compliant handling of personal data between these entities. MailChimp facilitates the collection and storage of contact details for the Festival, which allows us to create distribution lists, send emails including marketing communications and place online advertisements. Data may be transferred to MailChimp sub-processors which perform critical services for MailChimp such as the prevention of abuse and customer support. For more information, see MailChimp's Privacy Policy.

Ticketsolve processes data in Ireland and the U.K. but may transfer data to areas outside the European Union for storage and/or processing. Ticketsolve provides a ticket-purchasing platform for SROD ticketed events. For more information, see Ticketsolve's Privacy Policy.

Ticket Tailor processes data in Ireland and the U.K. but may transfer data to areas outside the European Union for storage and/or processing. Ticket Tailor provides a ticket-purchasing platform for SROD ticketed events. For more information, see <u>Ticket Tailor Privacy Policy</u>.

### YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for marketing purposes or if we intend to disclose any of your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms used to collect your data. You can also exercise the right at any time by clicking on the unsubscribe link in the email you received when you submitted your information. Please note that it may take time for us to comply with your request of not using your personal data for marketing purposes and, in the interim, we may continue to use your personal data as described in this Privacy Policy.

### **ACCESS TO AND CORRECTION OF YOUR INFORMATION**

You have the right to access and request correction of information held about you by contacting us directly using the contact details given above. You may request that we correct any erroneous personal information that we hold about you by contacting us at the above address.

### **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change how we handle the information we collect through the Site at any time. We will update this Privacy Policy to reflect any changes in our privacy collection and handling practices, and will indicate that changes to this Privacy Policy have been made by listing a new date under "Last Modified" at the end of this Terms of Use. Such changes will take effect immediately once posted to the Site. Your continued use of the Site will be deemed to be your acceptance of any changes to this Privacy Policy.

# **Data Breach Policy**

SROD takes the necessary measures to ensure your personal data is protected including encryption, password protection and physical safeguards. In the unlikely event of a significant

data breach, Ireland's Data Protection Commissioner and all affected individuals will be notified within the required legal time frame.

## CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed.

Last Modified 1st October 2023