



## ARENA GROUP CORPORATE PRIVACY POLICY

### Introduction

This policy describes the rights and privileges to individuals as defined in accordance with the principles of the General Data Protection Regulations. Herein referred to as “the ACT”.

### 1. Purpose

Arena collects and processes personal data about individuals, employees, freelancers, clients, contractors and suppliers. Processing is performed in conjunction with one or more of the following reasons;

- 1.1 Permission from the subject.
- 1.2 To comply with our statutory or regulatory obligations.
- 1.3 To fulfil our legitimate interests.

### 2. Scope

This policy applies to all employees, freelancers, contractors, service suppliers, visitors and any other individual, herein referred to as the “data subject” who has access to personal data or information that has come to exist under the control of Arena, owned by Arena or any partner working on their behalf.

### 3. Arena’s Commitment

Arena through the appropriate application of managerial, operational and technological controls will:

- 3.1 Only process data fairly and lawfully and accordance with all required conditions.
- 3.2 Specify the purpose(s) for which personal data will be used; (as defined within the “Arena Corporate Data Policy”)
- 3.3 Only collect the personal data that is necessary to fulfil the operational and legitimate needs of the company or to comply with our statutory or regulatory obligations.
- 3.4 Take necessary steps to ensure the quality, availability and security of personal data.
- 3.5 Put in place the appropriate measures to ensure that personal data is only retained for as long as needed to satisfy the purpose(s) it was obtained for or to comply with our statutory or regulatory obligations.
- 3.6 Ensure that the rights and freedoms of any individual providing personal information to Arena is respected.
- 3.7 Provide the appropriate technical and organisational security measures that will safeguard personal data against unauthorised or unlawful processing.

## **4. Individual rights**

“the ACT” grants rights and privileges to you with respect to the personal data processed by Arena and its processors. These rights apply to all individuals, employees, freelancers, clients, suppliers and contractors and members of the public. “the ACT” confers the following rights on data subjects:

- 4.1 personal data is to be processed lawfully, fairly and in a transparent manor.
- 4.2 collected for specified, explicit and legitimate purpose and not further processed in a manor incompatible with that purpose.
- 4.3 adequate, relevant and limited to only what is necessary.
- 4.4 accurate and where necessary kept up to date.
- 4.5 processed in a manner that ensures appropriate security and protection against unauthorised and unlawful processing.

## **5. Rights of access**

Subject to a number of exceptions, you have the right to be supplied with a copy of your personal data. Requests must be in writing and Arena has a statutory requirement to fulfil the request within the time period defined under the provisions of “the ACT”.

## **6. Right to Rectification**

You have the right to rectify any inaccurate or incomplete data Arena holds about you without undue delay.

## **7. Right to be Forgotten**

Subject to a number of exceptions, you have the right to request that Arena remove all of your personal data from our systems.

## **8. Right to restrict Processing**

Subject to a number of exceptions, you have the right to restrict the processing of your personal information.

## **9. Information Sharing**

Arena does not share, sell or rent your personal information with third parties for promotional, marketing or advertising purposes.

- 9.1 We may share your personal information with affiliated companies, trusted third parties service providers or processors working directly under our instructions where this is necessary for the performance of a contract you are party to or where there is a need to take steps at your request prior to entering into a contract.
- 9.2 Where there is a need to provide personal data to comply with state law.

## **10. References**

- 10.1 Data Protection Act 1998
- 10.2 General Data Protection Regulations 2016 (*enforceable from May 2018*)