This privacy and cookie policy clarifies the type, scope and purpose of the processing of personal data (hereinafter referred to as "data") we collect, use and process as a part of our online offer and the websites, functions and contents connected with it as well as external online presences, such as our Social Media Profile. (hereinafter jointly referred to as the "online offer"). With regard to the terms used, e.g. "processing" or "responsible person", we refer to the definitions in the Data Protection Act, (DPA).

# Who we are

We are Firefly Cinema Club Ltd (“we”, “our”, “us”) of 26 Leyshon Way, Bryncethin, Bridgend, CF32 9AZ with Company No. 13047611. We operate to the highest standards when protecting your personal information and respecting your privacy. If you have any questions about your personal information, or how we use it, you can contact us via our [contact form](https://www.fireflycinemaclub.co.uk/contact). We are the data “controller”, which means we are responsible for deciding how and why your personal information is used. We’re also responsible for making sure it is kept safe, secure and handled legally.

# The Regulation

This Data Protection Policy applies to the services of FIREFLY CINEMA CLUB LTD. If you live in the European Economic Area, Regulation (EU) 2016/679 (General Data Protection Regulation) is the European Regulation and in the UK, it is the 'Data Protection Act 2018' (DPA).

# The Supervisory Authority

The Information Commissioner’s Office (ICO) in the UK is the for us relevant authority in matters of data protection. You have the right to make a complaint at any time to the ICO (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.

# Accuracy

It is important that the data we hold about you is accurate and current, therefore please keep us informed of any changes to your personal data.

# What data do we process?

* Inventory data (e.g., names, addresses).
* Contact details (e.g., e-mail, telephone numbers).
* Content data (e.g., text input, photographs).
* Contract data (e.g., object of contract, duration, customer category, number plate).
* Payment data (e.g., bank details, payment history).
* Usage data (e.g., websites visited, interest in content, access times).
* Meta/communication data (e.g., device information, IP addresses).

# Processing of special categories of data (Art. 9 para. 1 DPA):

No special categories data is processed.

# Automated decision-making and profiling (Art.22 DPA)

We do not use automation for decision-making and profiling

# Children Data (Art.8 DPA)

Our website is not intended for children and we do not knowingly collect data relating to children.

# What are the categories of data subjects?

Customers, interested parties, visitors and users of the online offer, business partners. Visitors and users of the online offer. In the following, we refer to the data subjects collectively as "users".

# What are the purposes for processing?

* Provision of the online offer, its contents and shop functions.
* Provision of contractual services, service and customer care.
* Answering contact enquiries and communication with users.
* Marketing, advertising and market research.
* Security measures.

# What are the relevant legal bases for processing your data?

In accordance with Art. 13 DPA the following informs you about the legal basis of us processing your data and unless the legal basis is not specifically mentioned, the following applies:

Consent – This is where we have asked you to provide explicit permission to process your data for a particular purpose. (Art. 6 Para. 1 lit. a and Art. 7 DPA)

Contract – This is where we process your information to fulfil a contractual arrangement we have made with you. (Art. 6 Para. 1 lit. b DPA)

Answering your business enquiries – This is where we process your information to reply to your messages, e-mails, posts, calls, etc. (Art. 6 Para. 1 lit. b DPA)

Legitimate Interests - This is where we rely on our interests as a reason for processing, generally this is to provide you with the best products and service in the most secure and appropriate way. (Art. 6 Para. 1 lit. f DPA). Of course, before relying on any of those legitimate interests we balance them against your interests and make sure they are compelling enough and will not cause any unwarranted harm.

Legal Obligation – This is where we have a statutory or other legal obligation to process the information, such as for the investigation of crime or to meet responsible lending criteria. (Art. 6 Para. 1 lit. b DPA)

Vital interests – This is where we process your information for communications about security, privacy and performance improvements of our services. Or for establishing, exercising or defending our legal rights. (Art. 6 para. 1 lit. d DPA)

# Your Rights

You have a number of ‘Data Subject Rights’ below is some information on what they are and how you can exercise them. There is more information on the Information Commissioners website [www.ico.org.uk](http://www.ico.org.uk) .

* information about the processing of your personal data.
* obtain access to the personal data held about you.
* ask for incorrect, inaccurate or incomplete personal data to be corrected.
* request that personal data be erased when it’s no longer needed or if processing it is unlawful.
* object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
* request the restriction of the processing of your personal data in specific cases.
* receive your personal data in a machine-readable format and send it to another controller (‘data portability’).
* request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.
* You also have the right in this case to express your point of view and to contest the decision
* Where the processing of your personal information is based on consent, you have the right to withdraw that consent without detriment at any time through our contact form.

The above rights may be limited in some circumstances, for example, if fulfilling your request would reveal personal information about another person, if you ask us to delete information which we are required to have by law, or if we have compelling legitimate interests to keep it. We will let you know if that is the case and will then only use your information for these purposes. You may also be unable to continue using our services if you want us to stop processing your personal information.

We encourage you to get in touch if you have any concerns with how we collect or use your personal information. You do however also have the right to lodge a complaint directly with the ICO, the data protection regulator in the UK, their contact details can be found on their website www.ico.org.uk

# When do we disclose your Personal Data?

We may share your information with organisations that help us provide the services described in this policy and who may process such data on our behalf and in accordance with this policy, to support this website and our services. This will only be done on the basis of a legal authorisation (e.g. if a transfer of the data to third parties, such as payment service providers, in accordance with Art. 6 para. 1 lit. b DPA).

Also, if you have consented to it, or where there we have a legal obligation to do so or on the basis of our legitimate interests (e.g. when using agents, hosting providers, tax, business and legal advisors, customer care, accounting, billing and similar services that allow us to perform our contractual obligations, administrative tasks and duties efficiently and effectively).

If we commission third parties to process data on the basis of a so-called "contract processing agreement", this is done on the basis of Art. 28 DPA.

In relation to information obtained about you from your use of our website, we may share a cookie identifier and IP data with analytic and advertising network services providers to assist us in the improvement and optimisation of our website which is subject to our Cookies Policy.

We may also disclose information in other circumstances such as when you agree to it or if the law, a Court order, a legal obligation or regulatory authority ask us to. If the purpose is the prevention of fraud or crime or if it is necessary to protect and defend our right, property or personal safety of our staff, the website and its users.

# International transfers

Our main operations are based in the UK and your personal information is generally processed, stored and used within the UK and other countries in the European Economic Area (EEA). In some instances, your personal information may be processed outside the European Economic Area. If and when this is the case we take steps to ensure there is an appropriate level of security so your personal information is protected in the same way as if it was being used within the EEA.

Where we need to transfer your data outside the UK or EEA we will use one of the following safeguards as set out in (Art. 44 ff. DPA) :

* The use of European Commission approved standard contractual clauses in contracts for the transfer of personal data to third countries.
* Transfers to a non-EEA country with privacy laws that give the same protection as the EEA.

# Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, the data processed by us will be deleted or restricted in their processing in accordance with Art. 17 and 18 DPA. If the data is not deleted because they are required for other and legally permissible purposes, their processing is restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for 6 years for commercial or tax law reasons.

# Economic Analyses and Market Research

In order to run our business economically, to identify market trends, customer and user wishes, we analyse the data available to us on business transactions, contracts, enquiries, etc. In doing so, we process inventory data, communication data, contract data, payment data, usage data, metadata on the basis of Art. 6 para. 1 lit. f. DPA, whereby the persons concerned include customers, interested parties, business partners, visitors and users of the online offer. The analyses are carried out for the purposes of business management evaluations, marketing and market research.

In doing so, we may take into account the profiles of registered users with details, for example, of their purchasing transactions. The analyses serve us to increase user-friendliness, to optimise our offer and business efficiency and are not disclosed externally, unless they are anonymous analyses with summarised values.

If these analyses or profiles are personal, they will be deleted or made anonymous upon termination by the user, otherwise after two years from conclusion of the contract. In all other respects, the macroeconomic analyses and general trend determinations are prepared anonymously wherever possible.

# What are Cookies?

"Cookies" are small files that are stored on the user's computer. Different information can be stored within the cookies. A cookie is primarily used to store information about a user (or the device on which the cookie is stored) during or after his visit within an online offer.

Temporary cookies, or "session cookies" or "transient cookies", are cookies that are deleted after a user leaves an online offer and closes his browser. In such a cookie, for example, the contents of a shopping basket in an online shop or a login status can be stored.

Cookies are described as "permanent" or "persistent" if they remain stored even after the browser is closed. For example, the login status can be saved if the user visits it after several days. Similarly, the interests of the users can be stored in such a cookie, which are used for coverage measurement or marketing purposes.

Third party cookies" are cookies from providers other than the person responsible for operating the online service (otherwise, if it is only their cookies, it is referred to as "first party cookies").

We use temporary and permanent cookies and provide information on this in our data protection declaration. If users do not want cookies to be stored on their computer, they are asked to deactivate the corresponding option in the system settings of their browser. Stored cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional restrictions of this online offer. A general objection to the use of cookies used for online marketing purposes can be declared for a large number of services, particularly in the case of tracking, via the US site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/> .

Furthermore, the storage of cookies can be influenced by deactivating them in your browser settings. Please note that in this case not all functions of this online offer can be used.

# **Collection of access data and log files**

On the basis of our legitimate interests within the meaning of Article 6 paragraph 1 letter f. DPA, we collect data about every access to the server on which this service is located (so-called server log files). The access data includes the name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the website previously visited), IP address and the requesting provider.

For security reasons (e.g. to clarify acts of abuse or fraud), log file information is stored for a maximum of seven days and then deleted. Data whose further storage is required for evidential purposes are excluded from deletion until the respective incident has been finally clarified.

# Online presences in social media

We maintain online presences on the basis of our legitimate interests within the meaning of Art. 6 Para. 1 lit. f. DPA. We maintain online presences within social networks and platforms in order to communicate with customers, interested parties and users who are active there. Unless otherwise stated in this policy, we process the data of users if they communicate with us within the social networks and platforms, e.g. write articles on our online presences or send us messages.

# Google Analytics

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. DPA) we use Google Analytics, a web analysis service provided by Google LLC ("Google"). Google uses cookies. The information generated by the cookie about the use of the website by the user is usually transferred to a Google server in the USA and stored there.

Google will use this information on our behalf in order to evaluate the use of our website by users, to compile reports on the activities within this website and to provide us with further services associated with the use of this website and the internet. In doing so, pseudonymous user profiles of the users can be created from the processed data.

We only use Google Analytics with activated IP anonymisation. This means that the IP address of the user is shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there.

The IP address transmitted by the user's browser will not be merged with other Google data. Users can prevent the storage of cookies by adjusting their browser software accordingly; users can also prevent the collection of data generated by the cookie and relating to their use of the online offer to Google and the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

You can find further information on data use by Google, setting and objection options on the websites of Google: <https://policies.google.com/technologies/partner-sites> ("Data use by Google when you use the websites or apps of our partners"), <https://policies.google.com/technologies/ads> ("Data use for advertising purposes"), <https://adssettings.google.com/authenticated> ("Manage information that Google uses to show you advertising").

# Communication by mail, e-mail or telephone

We use means of distance communication, such as post, telephone or e-mail, for business and marketing purposes. We process inventory data, address and contact data as well as contract data of customers, participants, interested parties and communication partners.

The processing is based on Art. 6 para. 1 lit a, Art. 7 DPA, Art. 6 para. 1 lit f DPA in connection with legal requirements for advertising communications. Contact shall only be established with the consent of the contact partners or within the scope of the statutory permissions and the processed data shall be deleted as soon as they are not required and otherwise with objection/ revocation or discontinuation of the basis for authorisation or statutory archiving obligations.

# Changes

This Data Protection Policy and our commitment to protecting the privacy of your personal data can result in changes to this Data Protection Policy. Please regularly review this Data Protection Policy to keep up to date with any changes.

# Queries and Complaints

Any comments or queries on this policy should be directed to us using the following contact details.

Firefly Cinema Club Ltd

26 Leyshon Way, Bryncethin, Bridgend, CF32 9AZ

Company No. 13047611

[www.fireflycinemaclub.co.uk](http://www.fireflycinemaclub.co.uk)

If you believe that we have not complied with this policy or acted otherwise than in accordance with data protection law, then you should notify us. You can also make a referral to, or lodge a complaint with, the ICO.