

# PRIVACY POLICY

**Boneca** (Trading name of Elementek Limited)

Last Updated: January 2025

Data Controller: Elementek Limited, 85 Great Portland Street, First Floor, London W1W 7LT

---

This privacy policy describes how Boneca (trading name of Elementek Limited) collects, uses, and protects your personal data. We are the data controller in respect of the data we collect from you and about you.

We are committed to protecting your privacy by implementing appropriate security measures and complying with all UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Access to your personal data is limited to our employees and authorized third parties who process it on our behalf. We will never sell your personal data or pass it on to third parties for their own use.

## Contents:

- How we use and protect your personal information
  - Cookies
  - Sharing of your personal data
  - Transfer of your data outside of the UK or EEA
  - Processing your personal data
  - Our mailing list
  - Your data protection rights
  - How long we keep your information
  - Contacting us and making a complaint
  - Changes to our privacy policy
- 

## HOW WE USE AND PROTECT YOUR PERSONAL INFORMATION

We may collect different types of information about you during the course of our business. We may use your personal data for any or all of the following purposes:

- To provide you with customer service, helping you with enquiries and bookings and to personalise the service you receive from us
- To communicate with you about our offers, promotions, news, upcoming events, new events or any other updates, with your added consent
- To meet legal obligations and for establishing or defending our legal rights
- To compile reports and help us understand and improve our digital applications or marketing activity

### **Information we receive from you directly:**

This could include name, email address(s), telephone number(s) and if provided, your postal address and date of birth. All of which could be given to us when you make a booking directly at one of our events, or if you sign up online to receive our newsletter. We may also have information regarding your visits to our events including date and time of bookings, number of guests, and any special requests made when booking or during your visit.

### **Information recorded when you visit our websites:**

We may obtain information about you when you visit [www.bonecalondon.com](http://www.bonecalondon.com) to read or download information (such as your IP address which is automatically recognised by the web server) or if you comment or send a message to us through one of our social media presences.

### **Information collected when you sign in to our free wifi:**

This includes your full name and email address, depending on whether you opt-in to receive our newsletter agreeing to receive updates, events and news from Boneca.

### **Information collected from third parties:**

We may receive your information (name, email address, phone number, date and time of booking) through third-party booking platforms. These primarily include Shotgun (our main ticketing platform), and occasionally other platforms such as Eventbrite, TicketMaster, or Tixel.

These platforms have their own individual privacy policies which detail how they process your data and are available on their websites. You will always be asked when you book through them about passing your information on to us, and if you want to be added to our mailing list.

### **Linked sites:**

We may have links to other websites that are not managed by ourselves. We do not take responsibility for any information you share with these linked sites.

## COOKIES

In common with many websites, we use "cookies" to help us gather and store information about visitors to our websites. A cookie is a small data file that our server sends to your browser when you visit the site. The use of cookies helps us to assist your use of certain aspects of the site. You can delete cookies at any time or you are able to set your browser to reject or disable cookies.

We primarily use information from cookies for the following purposes:

- **Analytics:** To capture data via Google Analytics to monitor site usage, such as how long you spend on our website, which pages you visit and if you used a search engine to find us. This information is used to help us understand how customers are using our website.
  - **Necessary cookies:** These help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- 

## SHARING OF YOUR PERSONAL DATA

We sometimes need to share the information we process with other organisations. Where necessary or required, we may share your personal data with the following categories of third parties:

- Service providers assisting with our business activities (for example companies that send our marketing emails on our behalf), payment service providers, providers of booking systems, hosting providers, providers of IT support
  - Ombudsman, regulators, public authorities and security organisations such as the police, HM Revenue and Customs and the Information Commissioner's Office to the extent required by law, regulation or to exercise or defend our legal rights, including if we suspect fraud or attempted fraud
  - Staff at Elementek Limited
- 

## TRANSFER OF YOUR DATA OUTSIDE OF THE UK OR EEA

We do not transfer any of your personal data outside of the UK or EEA. At the time of this privacy policy, third parties with whom we share your data, for purposes of emailing our newsletters for instance, do not transfer or store any data outside of the UK or EEA.

In the event that a third-party processor engaged by us would transfer data outside of the UK or EEA, we will ensure that appropriate safeguards to protect your data are in place in accordance with UK GDPR requirements and would update this Privacy Policy to reflect those changes.

If your data has come to us through a third-party booking site, please refer to their individual privacy policies, available on their websites, for details about how they may process and transfer your data.

---

## **PROCESSING YOUR PERSONAL DATA**

We process your personal data under the following lawful bases as defined by UK GDPR:

### **Where we have obtained your consent:**

- To contact you via email from time to time with information we think may be of interest about our events

You may withdraw your consent at any time by contacting us using the details set out at the end of this Privacy Policy and/or by using the unsubscribe button in any of the emails we send to you.

### **Where it is necessary for the performance of a contract with you:**

- To provide you with our services
- To process your payment
- To respond to bookings made by you at one of our events

### **In line with our legitimate business interests:**

- To prevent fraud
- To improve our services and customer experience
- For business administration and development

### **In compliance with our legal obligations:**

- To adhere to all relevant UK regulations and laws
- To respond to lawful requests from authorities

We will not use your information for any other purposes unless we are required to do so by law, in connection with any legal proceedings, or in order to establish, exercise or defend our legal rights.

---

## OUR MAILING LIST

If you are on our mailing list, we will periodically – usually on a monthly basis – send you emails about our events, new events, ticketing special offers and news updates from Boneca. If you want to unsubscribe from these you can do so at any time by clicking unsubscribe at the end of any email you have received from us or by using the contact details below.

---

## YOUR DATA PROTECTION RIGHTS

Under UK GDPR and the Data Protection Act 2018, you have the following rights regarding your information:

- **Right to be informed:** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Policy.
- **Right of access:** You have the right to obtain access to your information (if we are processing it), and certain other information (similar to that provided in this Privacy Policy).
- **Right to rectification:** You are entitled to have your information corrected if it is inaccurate or incomplete.
- **Right to erasure:** This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- **Right to restrict processing:** You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
- **Right to data portability:** You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
- **Right to withdraw consent:** If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).

- **Right to object to processing:** You have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests grounds (including processing for direct marketing).

To exercise any of these rights, you can contact us using the details set out at the end of this privacy policy at any time.

---

## HOW LONG WE KEEP YOUR INFORMATION

We only keep your information for as long as is reasonably necessary for the purposes set out in this Privacy Policy and to fulfil our legal obligations. Generally, we retain:

- **Customer booking data:** For 7 years after your last interaction with us for accounting and legal purposes
- **Marketing consents:** Until you withdraw consent or 3 years of inactivity
- **Website analytics data:** For 26 months as per Google Analytics standard retention
- **CCTV footage:** For 30 days unless required for security incidents

We will securely erase your information if we decide that we no longer need it or if you contact us to request that we delete your data, subject to any legal retention requirements.

---

## DATA SECURITY

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing your personal data. These measures include:

- Encryption of personal data in transit and at rest
- Regular security assessments and updates
- Access controls limiting who can access personal data
- Staff training on data protection requirements
- Incident response procedures for data breaches

In the unlikely event of a personal data breach that poses a high risk to your rights and freedoms, we will notify you without undue delay and within 72 hours where feasible, in accordance with UK GDPR requirements.

---

## CONTACTING US AND MAKING A COMPLAINT

Please do contact us if you have any questions or complaints about this privacy policy or about how we handle your information.

**Data Controller:** Elementek Limited (trading as Boneca)

**Address:** 85 Great Portland Street, First Floor, London W1W 7LT

**Email:** [info@bonecalondon.com](mailto:info@bonecalondon.com)

**Website:** [www.bonecalondon.com](http://www.bonecalondon.com)

If you are not satisfied with our response to any query or request, or you believe our use of your information does not comply with data protection law, you can make a complaint to the UK's data protection regulator, the Information Commissioner's Office (ICO).

Visit [www.ico.org.uk](http://www.ico.org.uk) for more information on how to make a complaint.

---

## CHANGES TO OUR PRIVACY POLICY

We may update this privacy policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make changes, we will:

- Post the updated policy on our website
- Update the "Last Updated" date at the top of this policy
- If appropriate, contact you to inform you of any significant changes that affect how we process your personal data

We encourage you to review this privacy policy periodically to stay informed about how we protect your information.

---

## DISCLAIMER

The Boneca website and material relating to information, products and services (or to third party information, products and services), is provided 'as is' without any representation or endorsement made and without warranty of any kind whether express or implied, including but not limited to the implied warranties of satisfactory quality, fitness for a particular purpose, non-infringement, compatibility, security and accuracy.

We do not warrant that the functions contained in the material contained in this site will be uninterrupted or error free, that defects will be corrected, or that this site or the server that makes it available are free of viruses or represent the full functionality, accuracy, or reliability of the materials.

These Terms and Conditions shall be governed by and construed in accordance with the laws of England and Wales. Any dispute arising under these Terms and Conditions shall be subject to the exclusive jurisdiction of the courts of England and Wales.

---

This privacy policy was last updated on January 2025

© 2025 Boneca (Elementek Limited). All rights reserved.