



## TIME OUT ONLINE PRIVACY NOTICE

Last updated: 31 January 2019

Time Out and Time Out Market ("we", "us", "our") respects your concerns about privacy. This Online Privacy Notice (the "Notice") applies to personal data we collect on [www.timeout.com](http://www.timeout.com) and [www.timeoutmarket.com](http://www.timeoutmarket.com) (the "Site"). The Notice describes the types of personal data we obtain, how we use the personal data, and with whom we share it. We also describe the rights you may have and how you can contact us about our privacy practices.

The data controller is the organisation responsible for processing your personal information, collected through the Site. The identity of the data controller, will depend on your location. The following table sets out data controllers:

<b>Territory</b>	<b>Data Controller name</b>	<b>Contact information</b>
Australia	Print & Digital Publishing Pty Limited	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
Boston	Time Out Market (Boston) LLC	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
France and UK	Time Out England Limited Time Out Market Limited	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
Hong Kong and Seoul	Time Out Hong Kong Company Limited	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
Singapore	Time Out Media Singapore PTE Ltd	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
Portugal	Time Out Portugal LDA MC – Mercados da Capital LDA	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
Spain	Time Out Media Spain SLU	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
US	Time Out America LLC Time Out Market (New York) LLC Time Out Market (Miami) LLC Time Out Market (Chicago) LLC	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>

Canada	Concept TOM Montreal Inc. Time Out Market (Canada) Holdings Inc.	<a href="mailto:privacy@timeout.com">privacy@timeout.com</a>
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Please note that in some territories, third party franchisees run the sites and are the data controllers. For details of franchisee(s) and their sites, please consult the table at the end of this Notice. For more information, consult the franchisees' privacy notice(s) and contact them directly.

Visitors to the Site are subject to important limitations. Please review our Conditions of Use, which govern your visit to the Site.

## 1. HOW WE OBTAIN INFORMATION ABOUT YOU

We may collect personal data that you choose to provide to us through the Site, including, but not limited to, your first and last name, physical address, e-mail address, or telephone number, such as when you:

- Register on the Site, to create a User Account;
- Fill out a form on the Site;
- Sign-up to receive direct marketing communications on the Site;
- Make purchases on the Site;
- Sign-up to a feature that we offer on the Site and you provide your personal data in connection with that feature;
- Attend an event that we or one of our business partners has organised;
- Communicate with us (for example, on a social media platform or by sending us an email);
- Vote in Time Out and Time Out Market awards, enter a competition, respond to a survey.

When you visit our Site, we also may collect certain information by automated means using technologies such as cookies, non-cookie-based tokens, web server logs, tracking pixels, and web beacons. Cookies are files that websites send to your computer or other Internet-connected device to identify your browser uniquely or to store information or settings in your browser. Your browser may tell you when you receive certain types of cookies and how to restrict or disable certain cookies. Please note, however, that without cookies, you may not be able to use all of the features of our Site and may not be able to purchase products that use a "shopping cart." Non-cookie-based tokens are encoded URL-based identifiers that track e-mail click-thru activity or time-sensitive password reset keys and will work in scenarios where cookies are disabled or a session has not been initiated.

Where permitted by law, we may acquire personal data about you from third parties. This may include personal data shared between Time Out and Time Out Market affiliates and business partners, publicly-available profile information (such as your preferences and interests) on third party social media sites (such as Facebook and Twitter), and marketing lists acquired from third party marketing agencies.

We may also collect personal data in other contexts that we will notify you of at the time.

## **2. INFORMATION WE OBTAIN**

### ***Information That You Provide to Us, and our legal basis for processing the personal data***

Personal data that you provide directly to us will be apparent from the context in which you provide it, for example:

- If you register on the Site, to create a User Account, you will generally provide your full name, email address, city preferences, email subscription and communication preferences. Our legal basis for processing your personal data in this way is that processing is necessary for the performance of a contract to which you are a party;
- If you sign up to receive electronic marketing communications from us, you will generally provide your name, email address and other contact information, and your product preferences. Our legal basis for processing your personal data in this way is your consent to such processing for this purpose which shall be requested when you sign-up to such newsletters;
- If you make any purchase(s) for example purchase of an Offer, or tickets for Time Out and Time Out Market events, you will generally provide your full name, email address, telephone number, postal and billing address and payment details. Payments are processed by our various payment providers whom you will supply your payment details directly. We will not store your payment card information. Our legal basis for processing your personal data in this way is that processing is necessary for the performance of a contract to which you are a party.
- If you sign up to a feature on our Site, you will generally provide your name and contact information and any other information necessary to access the feature. Our legal basis for processing your personal data in this way is your consent to such processing which shall be requested as part of your compliance with the terms and conditions applicable to the feature;
- If you choose to vote in Time Out and Time Out Market awards, enter a competition, or fill out a survey, you will generally provide your name, and email address. Our legal basis for processing your personal data in this way is your consent to such processing which shall be requested as part of your compliance with the terms and conditions applicable to such awards, competition, or survey;

Each form on our Site varies in the information required and collected. In most cases, an asterisk (\*) indicates the required information on a form. You may choose to provide additional information within fields that are not required.

If you no longer wish to receive direct marketing communications from us, please click the unsubscribe link included in the footer of every email we send or, alternatively, email us at [privacy@timeout.com](mailto:privacy@timeout.com).

### ***Information That We Collect Automatically***

Our web servers may log information such as your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. The web server logs may also record information such as the address of the web page that referred you to our Sites and the IP address of the device you use to connect to the Internet. They may also log information about your interaction with the Sites, such as which pages you visit. To control which web servers collect information by automated means, we may place tags called “web beacons” — small files that link web pages to particular web servers and their cookies. We may also collect information from your browser, such as your browsing history, and use it in conjunction with data gathered from forms and e-mails to help us understand and respond to your needs.

Where the information gathered is completely anonymised, the information will not constitute personal data. Where your personal data is not in an anonymous form, our legal basis for processing your personal data in this way, is that it is in our legitimate interest to continually evaluate that personal data in operating and improving our business (and to ensure that the products and services we provide are relevant to the market) that is not overridden by your interests, rights and freedoms to protect personal data about you.

### ***Social Media Widgets***

The Site includes social media functions, such as Google, Twitter and Facebook widgets. These widgets may collect information about which pages you visit on the Site and the IP address of the device you use to connect to the Internet. The widgets may also set a cookie to ensure the features are functioning properly.

Social media functions and widgets are hosted either by a third party or directly on the Site. Your interactions with the social media functions and widgets located on the Site are governed by the privacy policies of the companies that provide them. If you use any of the social media functions or widgets on our Site, we strongly suggest you review the privacy policies of the companies that provide those functions and features.

### ***Information That We Obtain From Third Parties***

Information that we collect from third parties will generally consist of publicly-available profile information (such as your preferences and interests), for example from public social media posts.

### **3. HOW WE USE INFORMATION THAT WE OBTAIN**

#### ***Information That You Provide to Us***

We may use personal data that you provide to us to respond to your inquiry, for example, to contact you about your request, ask a question, provide announcements about products and future events, conduct surveys, and contact you for other reasons related to offering and improving our services. We use the personal data for these purposes because we have a legitimate business interest in providing services to our customers and other interested individuals that is not overridden by your interests, rights and freedoms to protect personal data about you. If you make a purchase on our Site, we also collect personal data because it is necessary for us to enter into a contract with you.

In addition to the uses discussed above, we may also use the personal data you provide on our Site to:

- operate, evaluate, and improve our business;
- develop new products and services;
- perform market research;
- advertise and market our products and services;
- determine the effectiveness of our advertising and marketing;
- analyze our products, services, and websites;
- administer the Site;
- segment and personalise the marketing communication that you have viewed on the Site.

We use the personal data for the purposes described above because we have a legitimate interest in operating and improving our business that is not overridden by your interests, rights and freedoms to protect personal data about you.

We may also use the information to protect against and prevent fraud, claims, and other liabilities and to comply with or enforce applicable legal requirements, industry standards, and our policies and terms. We use personal data for these purposes when it is necessary to protect, exercise or defend our legal rights, or when we are required to do so by law that applies to us.

#### ***Information That We Collect Automatically***

We use personal data that we collect automatically through cookies, non-cookie-based tokens, web beacons, and other automated means for purposes such as customizing and enhancing our visitors' visits to the Site, facilitating use of the Sites, collecting statistics about your visits to the Site, and understanding the manner in which our visitors browse the Site. We also use the information to help diagnose technical and service problems, administer the Site, and identify visitors to the Site. We use clickstream data to determine how much time visitors spend on web pages of the Site, how visitors navigate through the Site, and how we may tailor the Site to meet the needs of our visitors. We use the personal data for the purposes described above because we

have a legitimate interest in operating and improving our Site that is not overridden by your interests, rights and freedoms to protect personal data about you.

We also use third-party web analytic services on our Site, such as those of Eloqua and Google Analytics. The service providers that administer those services may use cookies and web beacons to help us analyze how users use the Site. The information collected by the cookies and web beacons (including your IP address) is available to the service providers, which use the information to evaluate your use of the Site.

To learn how to opt out of Google Analytics, visit: <https://tools.google.com/dlpage/gaoptout>.  
To learn how to opt out of Eloqua web analytics, visit: [http://www.eloqua.com/about/privacy/opt\\_status/](http://www.eloqua.com/about/privacy/opt_status/).

To learn more about the cookies that Time Out and Time Out Market uses on this Site, as well as to control your cookie settings on this Site, please read our [Cookie Policy](#).

### ***Other Uses of Information***

In addition to the uses described above, we may use personal data that you provide to us or that we collect for other purposes. Where that is the case, we will provide an additional privacy notice to you that describes the purposes for which we will use the personal data and our legal basis for doing so.

## **4. INFORMATION WE SHARE**

We do not sell or otherwise disclose personal data that you provide to us or that we collect on our Site, except as described here. We may share personal data you provide to us or that we collect on the Site with:

- Other companies in the Time Out group;
- Our business partners;
- A named third party, for example in relation to a competition you have entered, and only where you have given consent;
- service providers that perform services on our behalf.

The following table sets out the details of the other companies in the Time Out group, including the countries in which they are located:

<b>Company</b>	<b>Territory</b>
Print & Digital Publishing Pty Limited	Australia
Time Out England Limited Time Out Market Limited	France and UK

Time Out Hong Kong Company Limited	Hong Kong and Seoul
Time Out Media Singapore PTE Ltd	Singapore
Time Out Portugal LDA MC – Mercados da Capital LDA	Portugal
Time Out Media Spain SLU	Spain
Time Out America LLC Time Out Market (New York) LLC Time Out Market (Miami) LLC Time Out Market (Chicago) LLC Time Out Market (Boston) LLC	US
Concept TOM Montreal Inc. Time Out Market (Canada) Holdings Inc.	Canada

We may share personal data with service providers that perform services on our behalf such as payment service providers, analytics providers, hosting providers and advisers. All service providers have entered into legally binding agreements requiring them to use or disclose personal data only as necessary to perform services on our behalf or comply with applicable legal requirements.

In addition, we may disclose personal data about you (a) if we are required or permitted to do so by law or legal process, for example due to a court order or a request from a law enforcement agency, (b) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (c) in connection with an investigation of suspected or actual fraudulent or other illegal activity, and (c) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

## 5. DATA TRANSFERS

We may transfer the personal data that we collect about you to recipients in countries other than the country in which the personal data originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the personal data. When we transfer your personal data to recipients in other countries (such as the U.S.), we will protect that personal data as described in this Notice.

If you are located in the European Economic Area (“EEA”) or Switzerland, we will comply with applicable legal requirements providing adequate protection for the transfer of personal data to recipients in countries outside of the EEA and Switzerland. In all such cases, we will only transfer your personal data if:

- The country to which the personal data will be transferred has been granted a European Commission adequacy decision;
- The recipient of the personal data is located in the U.S. and has certified to the US-EU Privacy Shield Framework; or
- We have put in place appropriate safeguards in respect of the transfer, for example the EU Model Contracts.

You may request a copy of the safeguards that we have put in place in respect of transfers of personal data by contacting us as described in the How To Contact Us section below

## 6. HOW LONG WE KEEP INFORMATION

The time period for which we keep personal data depends on the purpose for which we collected it. In all cases we keep it for as long as necessary to fulfil the purposes for which we collected it. We will then delete the personal data, unless we are legally required to retain it or if we need to retain it in order to comply with our legal obligations (for example, for tax and accounting purposes).

Subject to any applicable legal requirements, we typically retain personal data as follows:

- Personal data you provide to us when you make a purchase through our Site: we keep this personal data in order to process and deliver your purchase, and then we store it securely for seven years.
- Personal data you provide when you sign-up to receive direct marketing communications: we keep most of this personal data for the duration of our relationship with you until you opt-out or until we do not have any contact with you for two years.
- Personal data collected for analytics purposes: we keep this personal data for a short period of time necessary for us to carry out the analytics. We anonymise personal data used for analytics, immediately.
- Website logs: we keep Site audit logs, which may contain your personal data, for several months.

## 7. YOUR RIGHTS AND CHOICES

If you are located in the European Economic Area (“EEA”) or Switzerland, you may have the following rights in relation to personal data that we hold about you:

- To request confirmation of whether we process personal data relating to you, and if so, to request a copy of that personal data;
- To request that we rectify or update your personal data that is inaccurate, incomplete or outdated.
- To request that we erase your personal data in certain circumstances, such as where we collected personal data on the basis of your consent and you withdraw your consent;



- To request that we restrict the use of your personal data in certain circumstances, such as while we consider another request that you have submitted, for example a request that we update your personal data;
- Where you have given us consent to process your personal data, to withdraw your consent; and
- To request that we provide a copy of your personal data to you in a structured, commonly used and machine readable format in certain circumstances.

You may contact us by e-mail or as described in the “How to Contact Us” section below to exercise your rights described above.

You also have the right to lodge a complaint with the data protection supervisory authority in your country.

## **8. UPDATES TO OUR ONLINE PRIVACY NOTICE**

We may update this Notice periodically and without prior notice to you to reflect changes in our personal data practices or relevant laws. We will post the updated version and indicate at the top of the notice when it was most recently updated.

## **9. HOW TO CONTACT US**

If you have any questions or comments about this Notice or any issue relating to how we collect, use, or disclose personal data, or if you would like us to update information we have about you or your preferences, you may contact us:

If you are located in the European Economic Area (“EEA”) or Switzerland, by email to [privacy@timeout.com](mailto:privacy@timeout.com), or our European Data Protection Officer: [DPO@timeout.com](mailto:DPO@timeout.com);

If you are located outside the EEA or Switzerland, by e-mail at: [privacy@timeout.com](mailto:privacy@timeout.com);

In writing, for Time Out, at:

Customer Care  
Time Out England Limited  
77 Wicklow Street  
London WC1X 9JY  
United Kingdom

Or, for Time Out Market:

Customer Care  
Time Out Market Limited  
77 Wicklow Street

London WC1X 9JY  
United Kingdom

You may also contact our Data Protection Officer in writing, for Time Out, at:  
Data Protection Officer  
Time Out England Limited  
77 Wicklow Street  
London WC1X 9JY  
United Kingdom

Or, for Time Out Market:  
Data Protection Officer  
Time Out England Limited  
77 Wicklow Street  
London WC1X 9JY  
United Kingdom

In the locations listed in the table below, third party franchisees run the sites and are the data controllers, so please contact the franchisee(s) below and consult their privacy notice(s) for more information:

<b>Territory</b>	<b>Data Controller name</b>	<b>Contact information</b>
Bahrain	ITP Media	<a href="http://www.timeoutbahrain.com">www.timeoutbahrain.com</a>
China	SEEC Media	<a href="http://beijing.timeoutcn.com">http://beijing.timeoutcn.com</a> <a href="http://www.timeoutbeijing.com">www.timeoutbeijing.com</a> <a href="http://shanghai.timeoutcn.com">http://shanghai.timeoutcn.com</a> <a href="http://www.timeoutshanghai.com">www.timeoutshanghai.com</a>
Croatia	Orso Plan d.o.o.	<a href="http://www.timeout.com/croatia">www.timeout.com/croatia</a>
Cyprus	Dias Publishing	<a href="http://www.timeoutcyprus.com">www.timeoutcyprus.com</a>
GCC	ITP Media	<a href="http://www.timeoutbahrain.com">www.timeoutbahrain.com</a> <a href="http://www.timeoutdoha.com">www.timeoutdoha.com</a> <a href="http://www.timeoutdubai.com">www.timeoutdubai.com</a> <a href="http://www.timeoutabudhabi.com">www.timeoutabudhabi.com</a>
Ghana	The Sloane Company	<a href="http://www.timeout.com/accra">www.timeout.com/accra</a>
Israel	Yuval Sigler Media	<a href="http://www.timeout.co.il">www.timeout.co.il</a> <a href="http://timeout.co.il/en">http://timeout.co.il/en</a>
Japan	Original Inc	<a href="http://www.timeout.jp/en/tokyo">www.timeout.jp/en/tokyo</a> <a href="http://www.timeout.jp/ja/tokyo">www.timeout.jp/ja/tokyo</a>

		<a href="http://www.timeout.jp/en/kyoto">www.timeout.jp/en/kyoto</a> <a href="http://www.timeout.jp/ja/kyoto">www.timeout.jp/ja/kyoto</a>
Malaysia	Mongoose Asia	<a href="http://www.timeout.com/kuala-lumpur">www.timeout.com/kuala-lumpur</a> <a href="http://www.timeout.com/penang">www.timeout.com/penang</a>
Mexico	Museo Citadino S.A. De C.V.	<a href="http://www.timeoutmexico.mx">www.timeoutmexico.mx</a>
Russia	C Media	<a href="http://www.timeout.ru">www.timeout.ru</a> <a href="http://www.timeout.ru/spb">www.timeout.ru/spb</a>
Sri Lanka	BT Options	<a href="http://www.timeout.com/sri-lanka">www.timeout.com/sri-lanka</a>
Switzerland	Riley and Jones	<a href="http://www.timeout.com/switzerland">www.timeout.com/switzerland</a>
Turkey	Ajans Media	<a href="http://www.timeoutistanbul.com">www.timeoutistanbul.com</a> <a href="http://www.timeoutistanbul.com/en">www.timeoutistanbul.com/en</a>