

PRIVACY NOTICE

Last updated: 4 September 2025

About this Notice

This notice ("**Privacy Notice**") explains how Neighbourhood Music Management ("**we**", "**us**" and "**our**") uses personal information that can be used to identify you (your "**Data**"), which we collect through your use of the website <https://santandave.com> ("**Website**").

We are committed to protecting the confidentiality of your Data and complying with applicable data protection laws. This Privacy Notice is intended to be clear and easy to understand, but please contact us using the details at section 2 if you have any queries or wish to object to us processing your Data.

You should not submit your Data to us if you do not agree with our use of your Data as set out in this Privacy Notice and/or if you **do not wish for your Data to be shared with Universal Music Group** (who will process it as either an **independent controller or processor** on our behalf) as set out in section 6. However, if you do not submit your Data, **or if you wish to exercise your rights to prevent us using your Data**, we may not be able to do business with you.

We may make changes to this Privacy Notice from time to time, including where necessary to reflect any changes in the ways in which we process your Data or any changes to data protection laws. Any updates to this Privacy Notice will be posted on our Website.

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1. **WHO WE ARE**

We are Neighbourhood Music Management, a limited company registered in England and Wales under company number 10401017, with its registered office at Eighth Floor, 6 New Street Square, New Fetter Lane, London, United Kingdom, EC4A 3AQ.

Data protection laws, including the General Data Protection Regulation of the EU and UK ("**GDPR**"), may apply to our use of your Data. We are a 'data controller' for the purposes of the GDPR.

2. **CONTACTING US**

If you have any questions or complaints regarding this Privacy Notice or how we use your Data, please contact us at:

Email: privacy@santandave.com

3. WHAT DATA WE USE

3.1. Categories of Data

The categories of Data that we process about you may include the following:

Category	Description
Identity Data	Details necessary to identify you as an individual. This may include your name, address, date of birth, age, marital status, title, gender, nationality, and country of residence.
Contact Data	Information necessary to contact you, such as your email address, postal address, telephone number, social media handles and other similar information contained in an email signature.
Correspondence Data	Information which you provide in, or we learn about you from, any correspondence or communications with us, including any enquiries in relation to our services, or any information relevant to your relationship with us that you post online.
Company Data	Details about any organisation(s) you are connected with, including the name and corporate details of the relevant organisation and your current or historical interests, roles and associations with it.
Transactional Data	Information necessary to process financial transactions between us for the purchase of products through the Website, such as tickets, merchandise and records, including your bank details, account number, sort code, payment amount, billing and shipping address, and any information contained in a payment reference.
Research Data	Information you provide in response to surveys and market research that we carry out.
Marketing Data	Data in relation to your preferences for receiving marketing from us and your communication preferences.
Usage Data	Information about how you use and interact with our Website, such as how often you access it, how long you spend on it and how you navigate around it, and your use of social sharing features such as 'likes', comments and links that you share (e.g. via Facebook comment or share). This also includes statistical information in connection with the delivery of our products and services, such information relating to email opening and clicks which is used to measure engagement with our newsletter.
Technical Data	Technical information relating to your use of our Website, such as your device type, unique device identifier (e.g. an IMEI number, IDFA, IP, or MAC address), network information, operating system type, platform/browser type, time zone settings and location.
Cookie Data	Information we collect through cookies in use on our Website. Please refer to our Cookies Policy below for further information.

3.2. Sensitive Data

We do not knowingly collect any **Sensitive Data** about you, such as details about your race/ethnicity, religious/philosophical beliefs, sex life/orientation, political opinions or health. If you chose to provide any Sensitive Data, we will process it on the basis of your explicit consent, unless we are required to process it to comply with a legal obligation.

3.3. Failing to provide Data

Where we need to collect your Data by law, or under the terms of an agreement we have with you, and you fail to provide that Data when requested (or fail to consent to the processing of that Data, if necessary), we may not be able to do business with you and/or such failure may result in a breach of the contractual obligations between us. We will notify you at the time if this is the case.

3.4. Changes to your Data

It is important that the Data we hold about you is accurate and current. Please let us know if your Data changes or if you become aware that any Data that we hold about you is not accurate.

3.5. Children's Data

We do not knowingly collect Data from anyone under the age of 13. If You are a parent or guardian and become aware that your child has provided us with any Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we will take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your Data and such consent must be provided by a parent or guardian, we may require your parent or guardian's consent before we collect and use your Data.

HOW WE COLLECT DATA

4.1. Data we collect from you

We collect Data from you directly when you:

- access, use or purchase products from our Website;
- take part in a contest, promotion, survey or other type of promotion through the Website or through any linked social media;
- interact with our Website and social media channels, including contributing to a blog or forum;
- make any enquiry or submit an online form using our Website or otherwise interact with customer services;
- subscribe to receive information from us, such as newsletters/artist information bulletins or other communications; and
- provide us with reviews, comments or feedback.

4.2. Data we collect from other sources

We may also collect **Identity Data, Contact Data, Company Data** and **Correspondence Data** from publicly available sources such as LinkedIn or company websites, or from organisations that are associated with you and provide such Data in the course of doing business with us.

We only collect Data from such sources where it is relevant to our relationship with you and in line with data protection laws.

5. HOW WE USE DATA

5.1. General Uses

The Data we collect and how we process it depends on the nature of our relationship with you. We will only use your Data where we are allowed to by law, including the requirement that there must be a 'lawful basis' for any processing.

Most commonly, we will rely on the following lawful bases to process your Data:

- **Contract:** in order to perform an agreement we have with you, or to do something you have asked us to do before entering into an agreement with you;
- **Legal Obligation:** to comply with an applicable law or regulation;
- **Legitimate Interests:** for the purposes of legitimate interests pursued by us or a third party. Where we rely on legitimate interests as the lawful basis, we will ensure that your interests and fundamental rights and freedoms are not overridden by our interests; and/or
- **Consent:** we may also process your Data where we have your consent. You have the right to withdraw your consent at any time; if you wish to do so, you should follow the instructions included in the communications we send to you (e.g., by clicking the 'unsubscribe' link in our newsletter) or contacting us using the details at section 2. The withdrawal of consent does not affect the lawfulness of processing based on consent before withdrawal, or the validity of processing based on other lawful grounds.

5.2. Specific purposes and lawful basis

We have set out in the table below the legal basis on which we process your Data including, where relevant, a description of the applicable legitimate interests we rely on. Please note that we may process your Data for more than one lawful basis depending on the specific purpose for which we are using your Data.

Purpose/Activity	Type of Data	Lawful basis
To manage our business relationship with you Including responding to your enquiries, fulfilling your requests and notifying you about changes to our Website terms	Identity Data Contact Data Correspondence Data Company Data Transactional Data Marketing Data	Contract Our Legitimate Interests in creating and developing relationships with our customers and the effective operation of our business
To process transactions you make on or through the Website	Identity Data Contact Data Transactional Data	Contract
To maintain records of our interactions	Identity Data Contact Data Correspondence Data Company Data	Legal Obligation Our Legitimate Interests in managing our business, including for staff training and development, and establishing,

Purpose/Activity	Type of Data	Lawful basis
		exercising and defending our legal rights
To communicate with you in response to your interactions with us online	Identity Data Contact Data Correspondence Data	Contract Our Legitimate Interests in the effective operation of our business through managing our relationship with customers and prospective customers and responding to feedback Consent , to the extent that we correspond with you in relation to Sensitive Data you have chosen to provide
To carry out data analysis Including customer, promotional and market analysis, to enable us to review, develop and improve the services and products that we offer	Identity Data Contact Data Correspondence Data Research Data Marketing Data Usage Data Cookie Data	Consent , to the extent we legally require your consent for such activities, such as collecting Data through cookies or other tracking technologies Our Legitimate Interests in finding and implementing ways to improve our business, Website and the services and products we offer our customers
To send you marketing Sending you promotional content and other information which we think you may find interesting	Identity Data Contact Data Marketing Data	Consent , to the extent we are legally required to rely on consent to process your data for marketing purposes Our Legitimate Interests in developing our products and services, growing our business and engaging with people that have shown an interest in the Website
Verification, fraud and crime prevention	Identity Data Contact Data Company Data Usage Data Technical Data	Our Legal Obligation to prevent fraud and other similar purposes Our Legitimate Interests in preventing fraud and other crimes and to maintain the integrity of our business

Purpose/Activity	Type of Data	Lawful basis
<p>To operate, develop and protect our Website</p> <p>Including troubleshooting, incident management and data breach management, data analysis, product and system testing, system maintenance, support, reporting and data hosting and monitoring traffic patterns</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Usage Data</p> <p>Technical Data</p> <p>Cookie Data</p>	<p>Our Legal Obligation with regard to data security</p> <p>Our Legitimate Interests in ensuring the effective operation of our business through maintaining the integrity of our IT systems, and promoting our business by making the Website available to you and enhancing the enjoyment of the online experience</p>

5.3. Changes to how we use your Data

We will only use your Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Data for an unrelated purpose, we will notify you (which may be by way of update to this Privacy Notice) and explain the legal basis which allows us to do so.

5.4. Automated decision-making

We do not use your Data to make decisions based solely on automated processing (including profiling) that produce legal effects or similarly significant effects on you.

6. HOW WE SHARE DATA

6.1. Who we share your Data with

We will not share any of your Data with third parties except as set out in this section or as otherwise notified to you or agreed between us from time to time. We may share your Data with:

- our **affiliates**, including our group companies, joint venture partners or other companies that we control or that are under common control with us, provided that any such affiliates honour this Privacy Notice;
- **third-party service providers and partners** who provide services that facilitate our business, for example, IT service providers in relation to our IT and cloud-based systems and payment processors. This includes Shopify, which powers our online store. You can read more about how Shopify uses your Data here: <https://www.shopify.com/legal/privacy>.
- **Universal Music Group and its affiliates (UMG):**
 - **as an independent controller:** UMG is the merchant of record for the Website. This means they fulfil orders placed through the Website (e.g. for records, tickets, and merchandise) and provide related customer support and fulfilment. They process the Data necessary to do so as an independent controller. You can read more about how UMG processes your Data here: <https://privacy.umusic.com/uk/>.
 - **as a processor:** UMG also assists us with managing our subscriber and marketing lists and communicating with you, including in connection with contests and promotions we

may run from time to time. Where we share your Data with UMG for such purposes, they will process it as a data processor on our behalf.

- our **professional advisers**, such as legal counsel, accountants and auditors, including in connection with legal proceedings, such as where we believe that your actions violate any agreement with us;
- **David Omoregie** (p.k.a 'Dave') and their representatives and third-party service providers so that, provided you have consented to their doing so, Dave can contact you and provide you with information that they believe may be of interest to you;
- with **law enforcement agencies** and other government departments or competent authorities where required to do so by law or regulation (such as in connection with an investigation of fraud or other legal enquiry, e.g., where we believe that your actions violate applicable laws or any agreement with us), or if we reasonably consider that this is necessary to help prevent or detect fraud or other crimes or to protect our rights, property, or safety, or that of our clients or others.

6.2. International transfers

From time to time, it may be necessary for us to transfer your Data internationally. In particular, your Data may be processed on the servers of third parties identified above that are based outside of the UK or EEA.

If you are based in the UK or EEA (or your Data is otherwise subject to the data protection laws of either of these jurisdictions), we will not transfer your Data outside of the UK or EEA (as applicable) unless:

- the laws of that country provide your Data with a level of protection equivalent to that under UK/EEA law (known as an 'adequacy decision'). A list of countries that have received an adequacy decision from the UK government is available [here](#) and includes countries within the EEA and various other jurisdictions (in some cases subject to certain requirements); or
- the transfer is done using legally approved safeguards, such as standard contractual clauses or binding corporate rules, or otherwise in accordance with data protection laws (e.g., where you have consented to the transfer or the transfer is necessary for the performance of a contract we have with you).

7. HOW LONG WE KEEP DATA FOR

As a minimum, we need to store your Data for as long as is necessary to enable us to fulfil the purpose for which we collected it. We may retain your Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

When deciding how long to keep your Data, we consider factors such as:

- the nature of our business relationship with you and the type of data involved;
- the purposes for which we process your Data and whether we can achieve those purposes by other means;
- our legal obligations to retain certain records for specified periods of time;
- the statute of limitations and any existing or potential disputes between us; and
- guidelines issued by relevant supervisory authorities.

If you would like more information about our specific retention periods for different aspects of your Data, please contact us using the details in section 2.

8. SECURITY

8.1. Security measures

We use appropriate technical and organisational security measures to help protect your Data against loss and unauthorised access, which include procedures to deal with any actual or suspected data breaches. However, please remember that no method of transmission over the internet, or method of electronic storage, is 100% secure.

We will notify you of any such breaches where we are legally required to do so.

8.2. Links to third party websites

Our Website may link or redirect to other websites, social media accounts or other content which is not under our control. Unless otherwise stated, such links or redirections are not endorsements of such website or representations of our affiliation with them in any way and such third-party websites are outside the scope of this Privacy Notice.

If you access such third-party websites or platforms, please ensure that you are satisfied with all relevant privacy notices applicable to those third-party websites/platforms before you provide them with any Data. We cannot be held responsible for the activities, privacy policies or levels of privacy compliance of any website or platform operated by any third party.

9. YOUR LEGAL RIGHTS

You may have various rights under data protection laws in relation to the Data we hold about you.

9.1. Your rights in connection with your Data

Under certain circumstances, you may be entitled to:

- **object** to us processing your Data where we do so on the basis of a Legitimate Interest and you believe your own rights and interests outweigh those interests;
- request **access** to a copy of the Data we hold about you (commonly known as a "data subject access request") to enable you to check that we are processing it lawfully;
- request **correction** of any inaccurate or incomplete Data we hold about you;
- request **erasure** of your Data;
- request a **restriction** of the ways in which we process your Data;
- request the **transfer** of your Data to another party in a machine-readable, commonly used and structured format. This right only applies where we process your Data on the basis of Consent or Contract and the processing is carried out by automated means.

For further information, or to exercise any particular right, please contact us using the details at section 2.

Please note that in most cases these rights are not absolute and are subject to exceptions or qualifications under data protection laws. For example, even if you request that we delete your Data, we may be required to retain certain elements of it for accounting and record keeping purposes or to comply with our legal and regulatory obligations.

We will aim to respond to your request within one month of receipt. In some cases, we may require more time to respond to your request and we will notify you about this at the time.

9.2. What we need from you

We may need you to provide us with further information to help us process your request and/or to confirm your identity to protect against your Data being incorrectly disclosed. We will not be able to fulfil your request until you provide us with this information.

9.3. Fees

You will not have to pay a fee to exercise your rights. However, if your request is clearly unfounded or excessive or if you request multiple copies of the information, then we may charge a reasonable fee or refuse to comply with the request.

9.4. Complaints

Please contact us using the details at section 2 if you are unhappy with how we have handled your Data.

If you are not satisfied with our response to your complaint or believe that we have not complied with data protection laws, you can make a complaint at any time to the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>), which is the UK's regulator for data protection.

COOKIES POLICY

This Website uses cookies and other similar technologies to improve your experience and support targeted advertising. For the purpose of this Cookies Policy, cookies, and other similar technologies (like scripts, plug-ins, tags, device fingerprints, local stored objects, beacons, and pixels) are all referred to as 'cookies'.

This Cookies Policy explains what cookies are, how we use them, the specific types of cookies in operation on this Website, and how you can deactivate any non-Essential cookies.

What are cookies?

Cookies are small text files that are used to store small pieces of information on your device when the Website is loaded on your browser. They help us make the Website function properly, make it more secure, provide a better user experience, and understand and improve how the Website performs.

What cookies do we use?

The Website uses the following categories of cookie types:

1. **Essential:** Essential cookies are necessary for the website to function properly. These cookies ensure basic functionalities and security features of a website.
2. **Functional:** Functional cookies are used to remember user preferences/settings and enhance the user's experience. They allow websites to maintain personalised interactions (such as storing login details, language settings) and support additional features that improve website performance.
3. **Analytics:** Analytics cookies are used to understand how visitors interact with a website and how it performs. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.
4. **Advertising:** Advertising cookies are used to provide visitors with customized advertisements based on the pages they have visited previously and to analyse the effectiveness of the ad campaigns.

Essential cookies are always enabled on this Website, but we will not use any other type of cookie without your consent.

You can find more information about the cookies we use and the purposes for which we use them by clicking this [link](#).

Please note that we use certain applications, such as Google Analytics, to help us evaluate performance of the Website, personalize advertisements, and improve your user experiences. Google Analytics uses cookies and other tracking technologies to perform their services and may be able to access to your data through such technologies. To learn how Google Analytics collects and processes data, please visit: www.google.com/policies/privacy/partners.

How to manage your cookie preferences

You can change your cookie preferences at any time through the cookie choices tools available on the Website. This will let you change your preferences or withdraw your consent to any cookies which are not Essential cookies right away.

In addition to this, different browsers provide different methods to block and delete cookies used by websites. You can change the settings of your browser to block/delete the cookies. Listed below are the links to the support documents on how to manage and delete cookies from the major web browsers:

- Chrome: <https://support.google.com/accounts/answer/32050>
- Safari: <https://support.apple.com/en-in/guide/safari/sfri11471/mac>
- Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox?redirectslug=delete-cookies-remove-info-websites-stored&redirectlocale=en-US>
- Internet Explorer: <https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-ininternet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc>

If you are using any other web browser, please visit your browser’s official support documents.

For more information on managing cookies, please go to www.allaboutcookies.org or visit www.youronlinechoices.eu, which have further information about behavioural advertising and online privacy.

Please note you may not be able to take advantage of all the features of our Website, including certain personalised features, if you delete or disable cookies.

DETAILS OF CHANGES TO THIS PRIVACY NOTICE AND COOKIES POLICY

Version	Date	Details of changes
1.0	2025	First published
2.0	4 September 2025	General updates, including to reflect changes in data sharing arrangements with service providers for fulfilling orders