



## CULTURE CREATIVE LIMITED

### PRIVACY POLICY

#### 1. Purpose and Scope

The purpose of this policy is to set out our reasons for collecting personal data and to demonstrate how we store and use this data.

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who contacts us through our websites or other means. We will only collect and use personal data in ways that are described in this policy, and in a way that is consistent with our obligations and your rights under the law.

##### 1.1. Information about Culture Creative Limited

Limited company registered in England under company number; 05651975.

Registered address: Ground Floor, Lion House, Alnwick, Northumberland, NE66 2PH.

Email address: [info@culturecreative.co.uk](mailto:info@culturecreative.co.uk).

Telephone number: 01665 798 007.

Postal address: Williams Way, Belford, Northumberland, NE70 7NX.

#### 2. What does this notice cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation")

as, 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we use is set out in Part 5, below.

#### **4. What are your rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- 4.1. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- 4.2. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- 4.3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- 4.4. The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- 4.5. The right to restrict (i.e., prevent) the processing of your personal data.
- 4.6. The right to object to us using your personal data for a particular purpose or purposes.
- 4.7. The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- 4.8. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- 4.9. Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. However, we would welcome the opportunity to resolve your concerns ourselves, therefore, we would appreciate it if you contacted us first, using the details in Part 11.

**5. What Personal Data do we collect and how?**

Depending upon your use of Our Site, we may collect and hold some or all of the personal [and non-personal] data set out in the table below, using the methods also set out in the table. We do not collect any ‘special category’ or ‘sensitive’ personal data or personal data relating to children.

Data Collected	How we Collect the Data
Name	Through sign up via the induction site
Address	Through sign up via the induction site
Post Code	Through sign up via the induction site
Telephone number	Through sign up via the induction site
Email address	Through sign up via the induction site

**6. How do we use your Personal Data?**

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What we Do	What Data we Use	Our Lawful Basis
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Administering our business.	All data	To manage respond to queries and requests.
Supplying our services to you.	All data	To evaluate acceptability for a facility
Communicating with you.	All data	Making contact with you

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone text message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We use the following automated systems for carrying out certain kinds of decision-making. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 11.

6.1. The following automated decision-making method(s) may be used:

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

**7. How long do we keep your Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long we Keep It
Identity Information including name and date of birth	Six years.
Contact information including address, telephone number and email address.	Six years.
Payment information including tokenised details	Six years.

**8. How and where do we store or transfer your Personal Data?**

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

**9. Do we share your Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, for example, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **10. How can you access your Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “*subject access request*”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## **11. How do you contact us?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [info@culturecreative.co.uk](mailto:info@culturecreative.co.uk).

Telephone number: 01665 798 007.

Postal Address: Williams Way, Belford, Northumberland, NE70 7NX

We will always try to maintain the highest standards and encourage the confidence you have in us. To achieve this, we request that any complaints be first brought to our attention so we can properly investigate matters.

If you would like to complain about Culture Creative Limited to the Information Commissioners Office you can contact them by telephoning 0303 123 1113.

## **12. Changes to this Privacy Notice**

It may become necessary to change this Privacy Notice from time to time, for example, if the law changes, or if we change our business in a way that affects personal data protection.