

Who are we?

Cultureshift Communications Ltd (“Culture Shift”) registered in England & Wales and whose registered office is at 4th Floor, 86 Princess Street, Manchester, M1 6NG are committed to protecting your privacy and keeping any personal data you provide to us confidential at all times, in accordance with UK data protection laws. This Privacy Notice sets out the information processing activities that Culture Shift carries out in its capacity as data controller.

All personal data collected by Culture Shift is processed in compliance with the requirements of the UK General Data Protection Regulation, the Privacy and Electronic Communications Regulation 2003 (PECR), and the UK Data Protection Act 2018.

How is your information collected?

Personal data is any information about an individual from which that person can be identified. The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

We may process and store information that you have provided voluntarily. For example, when you sign up to our newsletter we will ask you to provide your email address. It will be clear to you at this point what personal data you are providing.

Information that we collect from your activities

We collect information about how you use the Culture Shift website automatically through the use of cookies and other technologies. Some of these cookies can be enabled/disabled by selecting your preferences in the preference centre you are presented with when first interacting with this site. More information on cookies can be found under the ‘Use of cookies’ section below.

Public information

We may collect information about you from publicly available sources such as corporate websites and public social media accounts in order to reach out to you and promote our products and services. You can ask us to delete your information at any time.

How is your information used?

We will only process (use) your personal information if we:

- have a ‘legitimate interest’ to do so in order to support our company aims. Our use will be fair and balanced and never unduly impact on your rights;
- have a contract with you that we can only fulfil by using your personal information, e.g. to register you for an event;
- have a legal obligation to do so;
- have your consent to do so.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you.

The table below highlights the types of personal data that we use, what we use them for and the legal basis for processing.

Purpose	Type of data	Legal Basis for processing
To manage our relationship with you and your organisation	Name, e-mail address, business address and phone number, job title. Any other information that you elect to provide to us at any time.	Necessary for our legitimate interests (to administer your account)
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	Name, e-mail address, business address and phone number, billing information and address.	Necessary for our legitimate interests (to ensure that we provide the products and services requested by you in an effective and efficient way, to recover debts due to us)
To maintain up-to-date marketing preferences	Name, email address, marketing consent and any withdrawal of consent	Necessary for our legitimate interests (to ensure we adhere to your wishes regarding direct marketing)
To send you marketing communications	Name, email address	Necessary for our legitimate interests (to develop our products/services and grow our business) Consent – we will only contact you for direct marketing purposes with your prior consent where you have provided a personal email address.
To display targeted advertising to you online	Name, organisation, email address, job role	Consent - we will only collect information with cookies with your prior consent.
To register you for events Culture Shift is hosting where you have requested to attend	Name, email address	Performance of a contract with you.
To carry out prospecting activities	Name, organisation, email address, social media profile	Necessary for our legitimate interests (to promote our products and services)
To respond to enquiries which you have made.	Name, email address, enquiry details	Necessary for our legitimate interests (to respond to your enquiry)
To provide you with support which may include: (a) The resolution of technical support issues or other issues	Name, email address, support query, purchase details, billing information	Necessary for our legitimate interests (to handle your query or complaint) Necessary to comply with a legal obligation

relating to the website or services

(b) Investigating and resolving complaints

To conduct market research	Name, organisation, email address, job role, review details, survey responses	Necessary for our legitimate interests (to conduct market research and receive feedback on our products and services)
To carry out analytics on how you and other users use our website in order to understand how it is being used and improve the website experience. You can opt out of this at any time.	Information about how you use our website, page interaction information such as which pages you have visited, what links you have clicked on, search history, how you have moved around the website etc. We collect this information using cookies.	Consent – we will only collect information with cookies with your prior consent.

Who we share your information with

We may disclose your personal information to the following categories of recipients:

- third party services providers and partners (such as website hosting, customer relationship management software, event registration, email marketing software, and other suppliers) who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information;
- to any competent law enforcement body, regulatory, government agency, court, or other third-party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to any other person or company with your consent.

We will not sell or rent your personal information to third parties. Where we share your information with third parties, this will only include the information necessary for them to provide their services and will be shared under appropriate agreements to ensure that their data protection policies are in line with our own.

International data transfers

We may transfer personal data to a country outside the UK, for example where a third party service provider is located outside the UK. Whenever we do this, we will ensure that arrangements are in place to provide suitable safeguards, such as UK Adequacy Regulations, Standard Contractual Clauses, International Data Transfer Agreements, or another mechanism permitted by law. For further information about this, please contact us.

Data security

We're committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens. We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal data. We are Cyber Essentials certified.

How long will we hold information about you?

We only hold information about you for as long as it is needed for the purpose(s) it was collected, or as required by law.

Where you have purchased services from Culture Shift, we will typically hold your information for 6 years after the contract is terminated.

Where you have provided your information for the purpose of receiving marketing communications from Culture Shift, we will hold your details until you withdraw your consent for direct marketing. We will contact you periodically to confirm that you would still like to hear from us.

When it is no longer needed, information about you will either be deleted or anonymised.

How and when will you hear from us

We may use your contact details to update you about the latest news and events from Culture Shift.

Email

We rely on our legitimate interests to send direct marketing communications in a business to business context. However, where you have provided a personal email address to us, we will only send you marketing communications if you have provided your prior consent. This does not apply to service communications (see below).

We will always ask for your permission to contact you about our products, latest news and events when you:

- sign up to our newsletter on the Culture Shift website
- register for or attend a Culture Shift event

You can opt out of our marketing communications at any time by clicking the "unsubscribe" link in any of our emails or by contacting DPO@culture-shift.co.uk.

Service communications

We may send you certain communications, without your consent, if we are under a legal obligation to do so; if we feel sending the communication is in both yours and our interests; and/or it would be a disadvantage to you if we didn't send you the communication.

These communications may include:

- Notifying you about changes to our terms or privacy notice

- Asking you to provide feedback on Culture Shift products, services and events

Your rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

To exercise any of these rights, please contact DPO@culture-shift.co.uk.

Where we rely on consent as a lawful basis of processing, you may withdraw your consent at any time by emailing us at DPO@culture-shift.co.uk.

Making a complaint

If you have any queries or concerns about the way we may be processing your data, please contact us in the first instance at DPO@culture-shift.co.uk.

For further information about your data protection rights, to raise a concern or to make a complaint, please contact the UK [Information Commissioner's Office](#) (tel: 0303 123 1113).

Use of cookies

Like many websites, the Culture Shift website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow the website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. Navigate to our [Cookie Policy](#) page to manage your consent preferences and to understand more about how we collect and store cookies.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website, so we encourage you to read the privacy statements on the other

websites you visit. We cannot be responsible for the privacy policies of other sites (even if you access them using links found on our site).

Changes to our privacy policy

We may update this Privacy Notice from time to time by posting an amended version of the statement on the Culture Shift website. Please refer to this policy regularly. If at any time we decide to use personally identifiable information in a different manner than was stated at the time it was collected, we will notify you directly via email.

Any queries?

If you have any queries regarding this policy, our website or services, please contact us at DPO@culture-shift.co.uk or write to us at our registered office (4th Floor, 86 Princess Street, Manchester, M1 6NG).

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