# **Privacy Policy**

Welcome to the Privacy Policy of Culture & Culture Limited (**C&C**, **we**, **us** or **our**). We are committed to protecting the privacy of our users and this Privacy Policy explains how information obtained through our services (**Services**) is collected and used and the ways in which we will protect the personal information that you provide, together with other information we may collect regarding your use of our Website (**Data**).

By using our Services, you consent to the collection, use and transfer of Data in accordance with this Privacy Policy, and so please read this Privacy Policy before using any of our Services.

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This Privacy Policy sets out information on the following matters:

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It is important you read this Privacy Policy carefully and we recommend that you print a copy of this document for future reference. By using our Services you are deemed to agree to this Privacy Policy). If you disagree with these terms you should refrain from using our Website or any of our Services.

Defined terms and phrases shall have the same meanings and definitions given to them in the Terms of Use. The term "Data" shall include "Personal Data" (as defined in The Data Protection Act 1998 (the "Act")) and any other relevant data or information.

## 1. Who controls the collection and processing of Data?

For the purpose of the Act, the data controller is Culture & Culture Limited, a company registered in England and Wales with company number 08746616, whose registered office is at 20 Churchill Close, Woodstock, Oxfordshire, OX20 1LG, UK. Any questions or concerns about this policy, how we collect and process data or any request to gain access to your Personal Data, should be sent to that address or emailed to <a href="mailto:kanako@cultureandculture.com">kanako@cultureandculture.com</a>

## 2. The Data we collect

When you use our Services, you may provide us with Data about yourself from time to time, such as when providing details upon registration or by communicating with us, which may include your name, address, e-mail, and phone number. We may also collect Data you provide about your interests and preferences, for example, the types of events which may interest you, and how frequently you wish to receive updates and your marketing preferences.

# 3. How we use Data

We shall respect and protect the privacy of your Data, and it will only be used in order to:

- (i). provide you with and improve our Services;
- (ii). optimise your experience when using our Website;
- (iii). allow you to use interactive features of our Website and our Services;
- (iv). provide you with information, products and services offered by us and selected third parties we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about services similar to the Services. In the event that you do not wish to receive such communications you can opt out at any time by emailing us at <a href="mailto:kanako@cultureandculture.com">kanako@cultureandculture.com</a> with the subject line 'unsubscribe';
- (v). notify you about changes or interruptions to our Services;
- (vi). delete or anonymise your Data, and/or combine your Data with other Data we have collected.

# 4. When Data may be disclosed

We will not sell, exchange or otherwise distribute your Data to unaffiliated third parties without your consent, except to the extent required by applicable laws and regulations, or as set out in this Privacy Policy.

In addition to the uses set out above in this Privacy Policy, we may share Data we collect with selected third parties including:

(i). Our business partners, suppliers, licensors, agents and sub-contractors in order to provide the Services (for example where we enter into agreements with third parties who provide services to us or on our behalf); and

(ii). analytics and search engine providers that assist us in the improvement of the Services.

We may disclose Data we collect to third parties:

- (i). upon the sale or purchase of any business or assets (in which case we may disclose your Data to the prospective seller or buyer);
- (ii). if C&C or substantially all of its assets are acquired by a third party, in which case Data held by us about our users and customers will be one of the transferred assets; or
- (iii). if we are under a duty to disclose or share your Data in order to comply with any legal obligation or legal process (for example, a court order, search warrant or subpoena), or in order to enforce or apply our contractual rights, or any other agreement; in order to protect the rights, property, or safety of C&C, our users, customers, or others. This includes exchanging Data with other companies and organisations for the purposes of fraud protection.

#### 5. How Data is stored

We take steps reasonably necessary to ensure that your Data is treated securely and in accordance with this Privacy Policy.

All Data that you provide is stored on our secure servers or those of our suppliers. The Data we collect from you may be transferred to, and stored at, a destination outside of the European Economic Area ("**EEA**") We may use the storage facilities of third party suppliers for the purpose of storing your information and these facilities may also be located outside the EEA. Your information may also be processed by staff operating outside the EEA who work for us or for one of our suppliers for the purposes set out in this Privacy Policy. By submitting your Data, you agree to this transfer, storing or processing of Data.

We take appropriate technical and organisational measures to secure Data (and endeavour to only work with third parties who provide equivalent protections). However, the transmission of information via the Internet is not completely secure. We do our best to protect your Data, though we cannot guarantee the security of your Data transmitted to the Websites and any transmission is at your own risk.

We may retain Data for as long as we require for the purposes for which it was collected or as is otherwise required by applicable law. If you cease using our Services, we may continue to process your Data for a reasonable period. Once processing has been completed, we may securely delete or anonymise your Data.

### 6. Hyperlinks and links to other websites

The Services may, from time to time, provide links to and from the websites of our partner networks, advertisers and other third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites privacy policies or for the way in which third party websites collect or process Data. Please check these policies before you submit any Data to these websites. You understand, acknowledge and agree that all access to and use of any such third party website by you shall be at your own risk.

### 7. Accessing, amending and deleting Personal Data

You have the right to access Personal Data held by us and, if that Personal Data is inaccurate, you have the right to have it amended. If you ask to have Personal Information amended we will, except in cases in which special procedures are prescribed by applicable laws and regulations for such amendment, examine your request and, if necessary, amend the Personal Data. Where the Personal Data has been distributed to third parties we may also notify the relevant third parties of such amendment.

If you wish us to access the Personal Data we hold about you, you may exercise this right, subject to a fee of £10 to meet our administrative costs. For further information on to access your Personal Data please email us at kanako@cultureandculture.com

Where we are requested to erase or discontinue using or distributing Personal Data by a user because that such Personal Data is being used outside the scope permitted under, or in violation of, this Privacy Policy, we will promptly erase or discontinue using or distributing such Personal Data to the extent necessary to address this ground. However, deletion will not occur where: (a) erasing or discontinuing the use or distribution of the Personal Data would be in our judgment inordinately expensive or impracticable; and/or (b) we have taken necessary alternative measures to protect your rights and interests.

# 8. Amendments to this Privacy Policy

Any changes to our Privacy Policy will be posted on this page and you may also be notified electronically. Please revisit this page from time to time to see any amendments or revisions to our Privacy Policy, as the version then in force will apply whenever you use the Services.

Last updated: 31 August 2015