

CULTURE & CULTURE PRIVACY POLICY

At Culture & Culture it's not just cheese that we're serious about; we're also serious about respecting the personal data and privacy rights of all our customers and business partners when helping them to enjoy their lives through cheese!

This privacy policy explains how and why we use personal data, and what we do to ensure that your information is kept safe and secure in accordance with the General Data Protection Regulation and other applicable data protection and privacy laws (**Data Protection Laws**).

This policy explains:

1. Who we are and how to contact us
2. How we collect and process personal data:
 - A. Customers (and other persons)
 - B. Business and professional contacts
3. Cookies and website visitors
4. Recipients of personal data
5. How long we store personal data for
6. How we keep personal data safe
7. International transfers
8. Your rights as a data subject
9. Updates to this policy

1. WHO WE ARE AND HOW TO CONTACT US

We are Culture & Culture Limited (**C&C, we, us or our**), a limited liability company with registered number 08746616, having our registered office and main place of business at 3 Blacksmiths Close, Weston-on-the-Green, Bicester, Oxfordshire, OX25 3FL. You can contact us by writing to us at our office address, telephoning us on 07375-521541 or emailing kanako@cultureandculture.com

For the purposes of applicable data protection law, we are a controller in relation to much of the personal data we collect and process. This means that we are responsible for deciding how and why we use personal data, and for keeping it safe. We are registered as a data controller with the Information Commissioner's Office (**ICO**) with registration number ZA352509.

2. HOW WE COLLECT AND PROCESS PERSONAL DATA

A. CUSTOMERS (AND OTHER PERSONS)

How we collect personal data

We collect and process personal data (meaning information which relates to an identifiable individual) relating to our customers, who generally provide it to us directly although there may be occasions when a third party (such as a customer's spouse) provides it to us.

The types of personal data we collect

The categories of personal data we collect will vary, depending on the matter in question, but may include some or all of the following:

- contact information (such as name, address, telephone and email address); and
- bank details (provided by a customer or processed when we receive a payment).

We may process other types of personal information and, if we do, then it will be protected to the same high standard.

Why we need to use personal data

We use personal data because we need to for one or more of the following reasons:

- to provide our services to an individual (namely, to perform a contractual obligation we owe to that individual);
- in order to comply with our legal obligations; and
- to pursue our legitimate interests in operating and promoting the success of our business, or to pursue the interests of our customers in receiving our services.

If you do not provide the personal data which we need in order to enter into or to perform a contract with you, then we may not be able to contract with you or to provide the services which you have requested.

In limited circumstances, we may use personal data on the basis of your consent. If so, we will always clearly ask for your agreement to this. You are, of course, free to refuse this and we will inform you as to what (if any) consequences this might have.

B. BUSINESS AND PROFESSIONAL CONTACTS

We process personal data about individual business and professional contacts. These people include individual (or representatives from corporate) intermediaries, service providers, organisations that have attended our events, and potential customers.

The types of personal data we hold about these individuals typically consists of basic personal details and contact information, such as position title, name, email, address, telephone and the person's employer. Depending on the circumstances, and the nature of our relationship with the people involved, we may use this information to:

- fulfil our contractual obligations or exercise contractual rights;
- communicate with other organisations, advisers or intermediaries; or
- send marketing and promotional communications (usually by email).

We use this personal data because it is in our legitimate interests to promote our services and build business relationships.

If you receive news or marketing communications from us, it is because we think you might be interested in our firm or its services (usually on the basis of previous dealings with you or a recommendation from a third party).

You can unsubscribe from a marketing communication at any time by emailing a response to the communication to kanako@cultureandculture.com with the subject line "unsubscribe."

3. COOKIES AND WEBSITE VISITORS

We do not normally collect personal data about visitors to our website unless they choose to provide such information (such as by filling in a website form to attend an event).

Hyperlinks to other sites

Our website contains hyperlinks to third-party websites (such as Twitter, Google+ and Facebook). We are not responsible for the content or functionality of any of those external websites. If an external website requests personal information from you, the information you provide will not be covered by this policy. We suggest you read the privacy policy of any website before providing any personal information.

4. RECIPIENTS OF PERSONAL DATA

Personal data you provide to us will be kept private and confidential, and we will not disclose or share it with other data controllers without your permission. The only exception to this is where we are legally required to disclose personal data. For example, to comply with a court order. We may also be required to share personal information with regulatory authorities (including the Information Commissioner's Officer) in the event of an audit or investigation.

We share personal data with some of the third parties who provide services to our firm. This includes software and cloud service providers (such as Microsoft) and IT support services. However, these third parties will only process personal data (which may include your information) on our behalf for specified purposes and in accordance with our strict instructions.

We only use third party service providers who have provided sufficient guarantees, as required by Data Protection Laws, that your personal data will be kept safe. We always ensure there is a written contract in place which protects your personal data and prevents it from being used for any purpose other than providing services to our business, in accordance with Data Protection Laws.

5. HOW LONG WE STORE PERSONAL DATA FOR

We only retain personal data for as long as is necessary for the specific purpose(s) it was collected for (or for related compatible purposes such as complying with applicable legal, accounting, or record-keeping requirements).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from its unauthorised use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

6. HOW WE KEEP PERSONAL DATA SAFE

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, damaged or destroyed, altered or disclosed. This includes both physical security measures (such as keeping paper files in secure, access-controlled premises) and electronic security technology (such as digital back-ups and sophisticated anti-virus protection).

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to legal and contractual confidentiality obligations.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority of a breach when we are legally required to do so.

7. INTERNATIONAL TRANSFERS

We normally only store personal data within the European Economic Area (**EEA**). However, some of the technology and support services we use are provided by international organisations and/or companies which are based outside the EEA. Before using such service providers, we take steps to make sure that any personal data they process is adequately protected and transferred in accordance with Data Protection Laws, usually by one or more of the following methods:

- ensuring the recipient is in a country which the EU Commission has deemed provides adequate protection for personal data;
- implementing appropriate safeguards such as requiring the recipient to enter into Standard Contractual Clauses approved by the appropriate data protection supervisory authorities; or
- (if the recipient is based in the USA) transferring personal data to recipients who are certified under the EU-US Privacy Shield scheme. For example, the Microsoft Corporation (which provides us with software services) is registered under the Privacy Shield scheme.

8. YOUR RIGHTS AS A DATA SUBJECT

Data Protection Laws provide you with certain rights in relation to your personal data. These are as follows:

- **The right to access your personal data.** This enables you to receive a copy of the personal data we hold about you.
- **The right to request correction or completion of personal data.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **The right to request erasure of your personal data.** This enables you to ask us to delete or remove personal data (though this may not apply where we have a good, lawful reason to continue using the information in question). You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **The right to object to processing of your personal data.** You can object to us processing personal data for legitimate interests purposes or for direct marketing.
- **The right to restrict how your personal data is used.** You can limit how we use your information (primarily to storage or for use in legal claims).
- **The right to have a portable copy or transfer your personal data.** We will provide you, or (where technically feasible) a third party, with a copy of your personal data in a structured, commonly used, machine-readable format. Note this only applies to automated information we process on the basis of your consent or in order to perform a contract.
- **The right to withdraw consent.** If we are relying on consent to process your personal data you have the right to withdraw that consent at any time.

Responding

We try to respond to all personal data requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. Please also bear in mind that there are exceptions to the rights above and some situations where they do not apply.

We may need to request additional information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you to clarify your request.

Fees for making a request

You will not normally have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

How to make a request

If you want to exercise any of the rights described above, please email kanako@cultureandculture.com.

Your right to complain to a supervisory authority

You have the right to complain to a data protection supervisory authority (which, in the UK, is the ICO) if you are not satisfied with our response to a data protection request or if you think your personal data has been mishandled. For further information on how to make a complaint, please visit <https://ico.org.uk>.

9. UPDATES TO THIS POLICY

We will update this policy from time to time. The current version will always be posted on our website. This policy was last updated on **1** May 2018.