

Privacy Policy and [Cookie Policy](#)

Data Culture Change (Scotland) Ltd is committed to protecting and respecting your privacy. The last update was made on 14 February 2024.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, or that is provided to us about you by a third party, will be processed, stored and disclosed by us, including how and why we use your information.

We are committed to protecting personal data and maintaining the trust and confidence of our clients and partners.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://www.dataculturechange.com> (the Site) or using any services offered through or associated with our Site (the Services), you are deemed to have accepted and consented to the practices described in this policy.

Who we are

Data Culture Change (Scotland) Ltd, registered in Scotland, Company Number SC728545

Email address: hello@dataculturechange.com

Postal address: 33a Lenton Road, Nottingham, NG7 1DU

Telephone number: 07899 807376

ICO Registration: ZB555237

VAT: 439 8315 64

The terms 'Controller', 'Personal Data' and 'Processor' bear the respective meanings given them in the General Data Protection Regulation (EU) 2016/679.

You have the right at any time to make a complaint to the Information Commissioner's Office (ICO) the UK supervisory authority for data protection (www.ico.org.uk)

If you have questions regarding your personal information or its use, please contact our Data Protection Manager by email or by phone (see above).

Data Culture Change (Scotland) Ltd is the Data Controller of your personal information except where otherwise provided.

Data We Collect About You

We collect and process personal information so we can provide our Services to you. It's important that the personal data we hold about you is accurate and current. Please let us know if at any time your personal information changes by emailing us at hello@dataculturechange.com

The data we collect and process about you is explained in the sections below.

Data You Give Us

You give us information about you by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the Site, request a quote or subscribe to our Services, subscribe to our marketing database, participate in interactive features or other social media functions on our Site, or report a problem with the Site.

We may ask users to provide your phone number, date of birth and location data. If you are a student, you can provide your education information (such as the name of your university and your field of study), education history and work history. If you are a professional, you can provide your job title, company information, education history and work history. If you are a business or organisation, we collect additional business information (such as your industry and information about your point of contact). We collect this information for our legitimate interest in providing a more customised Service to you.

We also collect behavioural data about all our users, which we explain further in the sections below.

Data We Automatically Collect

Each time you visit or use our Site, we automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, location, network data, browser plug-in types and versions, languages, operating system and platform;

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We use this information for our legitimate interests in enabling our user reporting features, system administration, and to evaluating, providing, protecting or improving our Services (including by developing new products and services).

Data We Receive From Third Parties

We use third parties such as Google Analytics to track and report website and social media traffic. We collect information through these third parties for our legitimate interest in marketing and improving our Services. You are the Controller of your social media accounts such as LinkedIn or Twitter. Should you choose to engage with us on social media, your personal data may be processed for the purpose of responding to you, promoting our services or for evaluating our social media presence.

How we Handle Information

We will never share, sell, rent or trade your personal information to any third parties for marketing purposes. We make sure your personal data is always granted the highest level of protection and we only retain information that is necessary for the time and scope of our processing activities.

Data Sharing

From time to time, and always subject to a written contract, we may share information with our staff, partners, associates, customers, clients, suppliers and service providers e.g. professional advisers and data matching organisations. Some of our third-party service providers may have access to your data in order to perform services on our behalf including third parties who help to maintain the security and performance of our websites and IT infrastructure. We make sure anyone who provides these or similar services enters into an agreement with us and that they will not use your data for anything other than the clearly defined purpose relating to the service that they are providing.

We may also share your data where there is a legal obligation to do so.

Data Transfers and Security Outside of the EEA

We are subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

We may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or

If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place; or

Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Necessity and Purpose Limitation

We will keep your information only for as long as is reasonably necessary and we will not keep more information than we need. The retention period will vary according to the purpose – for example if making an unsuccessful job application, we will typically keep your data for up to twelve months (or until you request us to destroy or delete it) whereas a more limited sub-set of data required for the purpose of maintaining accurate accounts and records may be retained for seven years.

How We Use Your Data

We use your data to carry out our Site and Services in the following ways:

To administer and manage your account, to provide you with information you request from us, and to carry out any other obligations arising from any contracts entered into between you and us.

To ensure that content from our Site is presented in the most effective manner for you and for your device.

To allow you to participate in interactive features of our Service when you choose to do so.

To respond to communications from you and to provide you with information about our Services, including notifying you about changes to our Site or Services.

We also use your data to make our Site and Services better in the following ways:

To administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

As part of our efforts to keep the Site safe and secure, e.g. by conducting analysis required to detect malicious data and understand how this may affect your IT system.

Customers of ours, may have previously agreed to receive communications from us, or we are contact you for direct marketing on the basis of legitimate interest. If you would prefer to not receive these emails, or would like to object to receiving our direct marketing emails you can opt out at any time by emailing us at hello@dataculturechange.com

When we act as Data Processors

When we provide our consulting services, we act as Data Processors for our clients who are pursuing their legitimate interests of, for example, planning, marketing, research and/or

analysis. Our clients are the Data Controllers, where we act as a Data Processor on their behalf, or Processors acting on behalf of Data Controllers, in which case our role is that of sub-Processors. We only process, share, transfer and retain data based on their instructions and in accordance with a written contract(s).

Under these conditions we may share information with partners, associates, customers, suppliers and service providers (e.g. data matching organisations or sub-contractors). Such processing activity is carried out securely in accordance with the EU-US Privacy Shield which provides an adequate level of protection for personal data.

The data we process is typically derived from our clients' ticketing and CRM systems. Some of our processing activities may also involve matching data or appending data obtained from an independent source in accordance with written contract(s).

The information we handle may include:

- personal details including name, contact details, age category, gender and identifiers e.g. customer unique reference number

- family details

- lifestyle, business and social circumstances

- details of goods and/or services provided or to be provided

- information necessary for the development and testing of software

- personal information that may be inferred from transactional data, e.g. purchase of a student ticket.

In limited cases, and only with consent, we may also process information about your attitudes or opinions and/or special categories of personal data which may include racial or ethnic origin. This is usually obtained via non-compulsory primary research.

Your Legal Rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent. You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> If you wish to exercise any of the rights set out above, please email us at hello@dataculturechange.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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 for further information in relation to your request to speed up our response. We try to respond to all legitimate 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. In this case, we will notify you. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

Changes to This Privacy Policy

We keep our privacy notice under regular review. You are advised to visit this page periodically in order to keep up to date with any changes.

Cookie Policy

What's a Cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. By not blocking cookies and continuing to browse you are authorising the use of cookies. If you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

How do we use Cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website as well as products and / or services in response to what you might need or want.

Cookies are either:

Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser, they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or

Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics.

Cookie Categories

Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when buying a product and / or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.