

**THE CREATIVE DISTRICT Cº**

**THE CREATIVE DISTRICT IMPROVEMENT  
COMPANY LTD  
PRIVACY AND COOKIES NOTICE**

# THE CREATIVE DISTRICT CO

The Creative District Improvement Company Limited (Company Number: 08673178) (“**we**”, “**us**”) is committed to protecting and respecting your privacy.

This Privacy and Cookies Notice (“**Notice**”) (together with and any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to us will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (“**GDPR**”), the UK General Data Protection Regulation (“**UK GDPR**”) and the UK Data Protection Act 2018 (together the “**Data Protection Laws**”), the Data Controller is The Creative District Improvement Company Limited.

## YOUR PERSONAL INFORMATION

### Information we collect from you

We collect and process some or all of the following types of information from you in the course of your use of:

[www.thecreativedistrictco.com](http://www.thecreativedistrictco.com)

(the “**Website**”) or providing our services:

- Information that you provide by filling in forms on the Website or filling in forms as part of the registration process, speaking to us on the telephone. This includes information provided when subscribing to our service, or requesting further information or services. We may also ask you for information when you report a problem with the Website.
- Specifically, personal details such as name, email address, phone number, job title and company name, or any information input by you when using the Website or telephoning us, completing our survey forms, or using our services.
- If you contact us, we may keep a record of that correspondence.
- Information from surveys that we may ask you to complete for research purposes, although you do not have to respond to them.
- Information from visitors to our studio, such as CCTV, car registration plate number, and accessibility and mobility requirements.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.
- We will not store your credit card details. Transactions are carried out through third party payment processors.

The provision of your name, contact information, company name and company number (if applicable) is required from you to enable us to carry out our contractual obligations with you, or where you are contacting us as an employee of a company, with your employer. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

### Information we collect from other sources

If you are an employee of a company that is our customer or prospective customer, we may also collect and process personal data provided by your employer, such as your name, contact details, car registration number and accessibility/mobility information.

# THE CREATIVE DISTRICT CO

## USES MADE OF YOUR INFORMATION

### Lawful basis for processing

We rely on legitimate interests as the lawful basis on which we collect and use your personal data. Our legitimate interests are:

- The performance of our contractual obligation to our customer (either you personally, or your employer).
- To maintain and improve the Website and our services.

We rely on legitimate interests as the lawful basis on which we collect and use personal data relating to your accessibility and mobility requirements. Our legitimate interests are to assist you in accessing our site(s). We also rely on the explicit consent condition as the basis of such processing.

### Purposes of processing

We use information held about you in the following ways:

- To provide you with our services.
- To ensure that content on the Website is presented in the most effective manner for you and for the device(s) you use to access and view the Website;
- To provide you with information and offers that you request from us or which we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- To ensure accessibility of our premises for on-site visitors.
- To contact you regarding appropriate employment opportunities. Where you send us your CV or apply for a job with us, your personal data will be used in accordance with the Data Processing Schedule detailed below.

### Types of processing

The types of personal data we may process include those set out in Schedule 1.

### Marketing

In addition to the above uses we may use your information to notify you about goods or services which may be of interest to you. Where we do this, we will contact you by electronic means (e-mail or SMS) only if you have consented to such communication or where the law otherwise permits.

If you no longer wish to receive marketing materials from us you can either unsubscribe from our electronic communications using the method indicated in the relevant communication; or inform us at any time by contacting us at the contact details set out below.

## DISCLOSURE OF YOUR INFORMATION

# THE CREATIVE DISTRICT CO

We will disclose your information to third-party service providers, agents, consultants, freelancers, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to host our servers, to facilitate sending of marketing emails, and records management provider).

We may also disclose your personal data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or
- to protect our rights, property, or safety, or that of our affiliated entities and our users and any third party we interact with to provide the Website; or
- in relation to selected third parties only, only to the extent that you have consented to such selected third parties notifying you about certain goods or services, which may be of interest to you.

Other than as set out above and save insofar as is necessary in order for us to carry out our obligations arising from any contracts entered into between you and us, we will not share your data with third parties unless we have procured your express consent to do so.

## STORING YOUR PERSONAL DATA

### Security

We take appropriate measures to ensure that any personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

### Keeping your personal data up to date

If your personal details change you may update them by contacting us using the contact details below. If you have any questions about how we use data collected which relates to you, please contact us by sending a request by email to the contact details below.

# THE CREATIVE DISTRICT CO

We will endeavour to update your personal data within fourteen (14) working days of any new or updated personal data being provided to us, in order to ensure that the personal data we hold about you is as accurate and up to date as possible.

## How long we keep your personal data

We will hold your personal data for 7 years from the last point of contact with you or your employer (where applicable), or as detailed below within the retention periods in Schedule 1

## Where we store your personal data

All information we hold about you is stored on our secure servers within the UK.

The data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom and/or the European Economic Area ("EEA") such as the United States of America. It may also be processed by staff operating outside the United Kingdom and/or EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of services to you or your employer (where applicable).

In the event we transfer your personal data to a country without an adequacy decision from the United Kingdom, any such transfer will be subject to standard contractual clauses approved by the United Kingdom.

If you would like further information please contact us (see 'Contact' below).

## **YOUR RIGHTS**

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you (e.g. company name, full name, email address and or phone number;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and

# THE CREATIVE DISTRICT CO

- let us know the information to which your request relates, including any reference numbers, if you have them

## HOW TO COMPLAIN

We hope that we can resolve any query or concern you raise about our use of your information.

The Data Protection Laws also give you right to lodge a complaint with a supervisory authority, in particular in the UK or the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

## CHANGES TO OUR PRIVACY NOTICE

We reserve the right to modify this Notice at any time. Any changes we may make to our Notice in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy notice.

## INFORMATION ABOUT OUR USE OF COOKIES AND IP ADDRESSES

We may collect information about your mobile phone, computer or other device from which you access the Website including where available your IP address, operating system and browser type, for systems administration and to report aggregate information to third party affiliates. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may, however, use such information in conjunction with the data we have about you in order to track your usage of our services.

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve the Website. By using our Website you agree to our use of cookies as more specifically set out below.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies we use include:

- **“Analytical”** cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily. For example, we use Google Analytics cookies.
- **“Strictly necessary”** cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
- **“Functionality”** cookies. These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **“Targeting”** cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed to our affiliates' websites. We will use this information to make our Website, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties affiliates may also use cookies, over which we have no control.

Cookies which are strictly necessary for the core functionality of the website are enabled by default, and set automatically at the point you access the website.

# THE CREATIVE DISTRICT CO

Any cookies which are not strictly necessary for the functioning of the website will not be set unless you expressly consent to them through the cookie banner by clicking “accept”.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website.

## CONTACT

All questions, comments and requests regarding this Privacy and Cookies Notice should be clearly marked “**RE: GDPR**” and addressed to:

Sanjay Nagpal  
sanjay@thecreativedistrictco.com

Or by post to: 10A Acton Street, London, WC1X 9NG

# THE CREATIVE DISTRICT IMPROVEMENT CO

## THE SCHEDULE DATA PROCESSING ACTIVITIES

Type of data	Type of data subject	Type of processing	Lawful Basis for processing (s.5)	Purpose of processing	Type of recipient to whom personal data is transferred	Retention period
Name, email address, address, job title, company name, Social Media name	Customers	Collection, storage, consultation	Legitimate Interests  Complying with a contract	Providing customer with our services	Contractors e.g. IT services suppliers, resource management system  Payment processor	7 years from last contact
Transaction details	Customers	Collection, storage, consultation	Legitimate Interests  Complying with a contract	Providing customer with our services	Contractors e.g. IT services suppliers  Payment processor	7 years from last contact
Information provided in correspondence	Customers	Collection, Storage, consultation	Legitimate Interests	Providing customer with our services	IT Service providers	7 years from last contact
Information provided for a survey	Customers	Collection, use for research	Consent	Research to inform and improve our services	IT service providers and the survey hosting companies	One year from the date that the survey information is received
Information provided in	Customers	Collection,	Legitimate	To ensure health	Employees of	One year form the



# THE CREATIVE DISTRICT IMPROVEMENT CO

respect of mobility and accessibility information		consultation	interest and consent	and safety of customer on-site	Customers	date of last contact
Email address	Customers	Collection, marketing	Legitimate Interests  Consent where necessary	Marketing our services to customers through newsletters and promotional materials	Email and digital marketing service providers	One year from last contact
CV	Potential Employees	Collection, Storage, Consultation	Legitimate Interests	To consider opportunities for employment	Contractors e.g. IT services suppliers	One year from last contact
CCTV	Customers, Potential Employees	Collection, Storage, Consultation	Legitimate Interests	To ensure and maintain site security	Contractors eg: CCTV services	90 days, or where footage is pertinent to a particular incident, 6 months after the end of investigation of said incident.