



LimeCulture Privacy Notice

Statement

1. This is the privacy notice of LimeCulture. In this document, “we”, “our”, or “us” refers to LimeCulture.
2. Our Company Details are as follows:

LimeCulture Solutions Ltd

Company Registration Number:
16417334

Registered Office:
The Old Plough, 2 Caxton Road, Great
Gransden, SG19 3BE

LimeCulture Community Interest Company

Company Registration Number:
07667756

Registered Office:
The Coach House, 2a Carr Road, Hale,
Cheshire, WA15 8DX

Introduction

3. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
4. If you do not agree with this notice, you may choose not to use our website or services.
5. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
6. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
7. Our policy complies with UK law accordingly implemented, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

8. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [knowyourprivacyrights.org](https://www.knowyourprivacyrights.org).
9. Except as set out in this notice, we do not sell your personal data. We only share personal data where necessary for the delivery of our services, to meet legal obligations, or with trusted third-party processors acting on our behalf.

The basis on which we process information about you

10. The law requires us to determine under which of six defined basis we process different categories of your personal information, and to notify you of the basis for each category.
11. If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.
12. If the basis changes, then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

Information we process because we have a contractual obligation with you

13. When you create an account on our website, contract a service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.
14. To carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information. We may use it to:
 - a. verify your identity for security purposes
 - b. sell products to you
 - c. provide you with our services
 - d. provide you with suggestions and advice on products, services and how to obtain the most from using our website.
15. We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter a legal contract.
16. Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.
17. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

Information we process with your consent

18. Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including training or job opportunities, or information about our products and services, you provide your consent to us to process information that may be personal information.
19. Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.
20. Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.
21. Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.
22. Where you have given explicit consent, we may share your name and contact information with carefully selected partners who provide services relevant to your interests. You will always have the option to withdraw this consent.
23. We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.
24. You may withdraw your consent at any time by instructing us via email to mydata@limeculture.co.uk. However, if you do so, you may not be able to use our website or our services further.

Information we process for the purposes of legitimate interests

25. We may process information on the basis there is a legitimate interest, either to you or to us, of doing so. Where we process your information on this basis, we do after having given careful consideration to:
 - a. whether the same objective could be achieved through other means
 - b. whether processing (or not processing) might cause you harm
 - c. whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.
26. For example, we may process your data on this basis for the purposes of:
 - a. record-keeping for the proper and necessary administration of our business

- b. responding to unsolicited communication from you to which we believe you would expect a response
- c. protecting and asserting the legal rights of any party
- d. insuring against or obtaining professional advice that is required to manage an organisational risk
- e. protecting your interests where we believe we have a duty to do so.

Information we process because we have a legal obligation

- 27. We are subject to the law like everyone else. Sometimes, we must process your information to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

Information provided on the understanding that it will be shared with a third party

- 28. Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people. In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it. We do not specifically use this information except to allow it to be displayed or shared.
- 29. We do store it, and we reserve a right to use it in the future in any way we decide. Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.
- 30. Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at mydata@limeculture.co.uk.

Complaints regarding content on our website

- 31. Our website is a publishing medium. Anyone may register and then publish information about himself, herself or some other person. We attempt to moderate user generated content, but we are not always able to do so as soon as that content is published. If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate. Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you. If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

Information relating to training and workshop bookings

32. LimeCulture collects, holds and processes personal data relating to its students and those registering to attend workshops.
33. It is essential for it to do so to manage its operations effectively. It is also a requirement of our Investors in Quality (IIQ) license by NCFE that we retain information relating to students. The data held by LimeCulture is mainly taken from the details provided during the booking process on the website.
34. However, LimeCulture adds data that accumulates during and after students' studies with LimeCulture. This may include special category data (such as information relating to health or safeguarding). Where this occurs, we will ensure that appropriate lawful bases and additional safeguards are in place in line with data protection legislation. We may use this data for marketing purposes. By enrolling you give your consent for LimeCulture to process your personal data collected via the enrolment process and subsequently during your studies. In some cases, photographers may be present at an event or training session. We will also seek and record your consent separately to take photographs.
35. If you want to know what information we hold about you or opt out of any marketing communications or make any changes to your consent, for example relating to the use of photographs, please email mydata@limeculture.co.uk.

Marketing and Email

36. Under the GDPR we use the consent as a lawful basis for anyone subscribing to our newsletter or mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above.
37. Marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data.
38. Such data, within its limitations will show the activity each subscriber made for that email campaign.
39. Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences.
40. Our preferred Email Marketing Provision is provided by MailChimp located in the US. MailChimp (Intuit) is based in the United States. Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place, such as International Data Transfer

Agreements (IDTAs) or other approved mechanisms, in line with UK data protection law. For further information on data processed outside of the EU see Section 16.

41. The information we hold will be
- a. Name
 - b. Email address
 - c. IP address
 - d. Subscription time & date
 - e. Organisation (where appropriate).

Job application and employment

42. If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.
43. If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

Sending a message to our team

44. When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us to reply with the information you need. We record your request and our reply to increase the efficiency of LimeCulture.
45. We keep personally identifiable information associated with your message, such as your name and email address to be able to track our communications with you to provide a high-quality service.

Complaints

46. When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.
47. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.
48. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Use of information we collect through automated systems when you visit our website

Cookies

49. Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.
50. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.
51. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.
52. Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.
53. When you first visit our website, we ask you to consent to the use of non-essential cookies. Essential cookies are required for the operation of the website will still be used. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.
54. If you choose not to use cookies or prevent their use through your browser settings, you will not be able to use all the functionality of our website.
55. We use cookies in the following ways:
 - a. to track how you use our website
 - b. to record whether you have seen specific messages we display on our website
 - c. to keep you signed in our site.
56. The following cookies are used on our site:

<u>_ga, _gali, _gat, _gid</u>	These cookies are used to collect information about how visitors use our website and WordPress blog. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. Read Google's overview of privacy and safeguarding data.
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DYNSRV, DYNSRV	These cookies are used to help the performance of the website and are deleted when you close your browser.
cookie_notice_accepted	This cookie only ever contains the value “true” indicating that you clicked on the “OK” button showed in the overlay cookie notice. It contains no personal information. Its purpose is to remember that you have previously agreed on our use of cookies; so that it doesn’t have to remind you about cookies every time you visit the website. It expires after 29 days.
jetpack_sso_redirect_to, jetpack_sso_original_request, jetpack_sso_nonce	A security system for the Content Management System that powers our blog. They are deleted after the session.

57. We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third-party website.

Personal identifiers from your browsing activity

58. Requests by your web browser to our servers for web pages and other content on our website are recorded.
59. We record information such as your geographical location, your Internet service provider, and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.
60. We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.
61. If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

Disclosure and sharing of your information

Information we obtain from third parties

62. Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.
63. No such information is personally identifiable to you.

Third party advertising on our website

64. Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

Data may be processed outside the European Union

65. Our domain is hosted by Easyhost (easyhost.com) and our website is hosted by Cornerstone DM (www.cornerstonedm.co.uk) We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business including email marketing. Accordingly, data obtained within the UK or any other country could be processed outside the European Union. For example, some of the software our website uses may have been developed in the United States of America or in Australia.
66. We use the following safeguards with respect to data transferred outside the European Union:
- a. either the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
 - b. the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union specifically the Information Commissioners Office, UK
 - c. we comply with a code of conduct approved by a supervisory authority in the European Union specifically that of the Information Commissioners Office, UK
 - d. we are certified under an approved certification mechanism as provided for in the GDPR
 - e. both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information.

Personal information access

67. At any time, you may review or update personally identifiable information that we hold about you, by signing in to your account on our website. To obtain a copy of any information that is not provided on our website you may send us a request at mydata@limeculture.co.uk.

Your Data Protection Rights

68. You have rights under data protection law, including the right to:
- access your personal data

- request correction of inaccurate data
- request erasure of your data
- restrict processing of your data
- object to processing
- request data portability
- withdraw consent at any time (where applicable)

You can exercise these rights by contact us at mydata@limeculture.co.uk

69. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

Removal of your information

70. If you wish us to remove personally identifiable information from our website, you may contact us at mydata@limeculture.co.uk. This may limit the service we can provide to you.

Verification of your information

71. When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

How you can complain

72. If you are not happy with our privacy policy or if have any complaint, then you should tell us by email. Our address is mydata@limeculture.co.uk. You can find further information about our complaint handling by requesting a copy of our complaints policy. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
73. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>.

Retention period for personal data

74. Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:
- a. to provide you with the services you have requested
 - b. to comply with other law, including for the period demanded by our tax authorities

c. to support a claim or defence in court.

Compliance with the law

- 75. Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.
- 76. However, ultimately it is your choice as to whether you wish to use our website.

Review of this privacy policy

- 77. We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records. This notice is reviewed regularly to ensure ongoing compliance with applicable data protection legislation and best practice.
- 78. If you have any question regarding our privacy policy, please email mydata@limeculture.co.uk.