

# IMPACT & CULTURE LTD

## Privacy Policy

**Last Reviewed:** 25/10/2024

**Next Review:** 25/10/2025

Please read this **Privacy Policy** carefully before providing personal data or purchasing a course, audit, or other service (*"Product"*) from Impact & Culture Ltd (*"Impact Culture"*) operated by Impact & Culture Ltd (*"us", "we", "our", "Provider", "Service", or "Company"*).

These are the principles of Impact Culture's Data Processing and Privacy Policy, by purchasing any of our consulting or learning programmes, or by providing personal data in a survey or in another format either yourself or on behalf of your employees, you (*"User", "Customer", "Consumer", "Client"*) agree to the use of your data by us for the relevant service or product you use.

Whilst Impact Culture will review this policy yearly, it may be necessary for us to review this more frequently, so it is recommended that you check this page regularly. Continued use of the site or training materials following any updates to the privacy policy constitutes acceptance.

Your access to and use of the Service is conditioned on your acceptance of and compliance with this policy. This policy applies to all visitors, users and others who access or use the Service.

If you disagree with any part of the policy herewith then you must inform Impact Culture who will be unable to offer some services which require personal data. This does not constitute a termination of any agreed upon contractual terms, which will be covered independently by and within a separate legal contract.

## **1. Data Collection**

We collect the following types of data in order to accept and respond to a query you may have, to provide online learning services, or to provide a subscribed newsletter service should you opt in to join this.

- First Name
- Last Name
- Email Address

We may also collect additional information from you in the form of a survey in order to effectively perform our audit services, which may include additional personal data points such as age, ethnicity, religion, sexual orientation, and any or all of the protected characteristics. All information provided by you in these surveys is anonymised. No raw demographic data is ever shared with any external parties or individuals outside of Impact Culture. Personal data cannot be traced back to any specific respondent.

The type of data we collect is categorised as research and, due to the data being completely dissociated with any identifiable information, it cannot be requested as part of a data access request.

Our practices align with GDPR regulations, including the lawful and fair processing of data, purpose limitation, data minimisation and the rights of data subjects. The data collected through these surveys is exclusively used to inform a comprehensive report of our findings - raw data will only ever be used as part of this report creation where it is further anonymised as is

possible and necessary. This includes redacting information that may lead to identifying an individual, or referencing a response but not including it should redaction not be possible.

We abide by the principles and guidance outlined under the [General Data Protection Regulation \(GDPR\)](#).

If you decide to make a purchase of a product or service from us, you may also provide some payment information including:

- Debit/Credit Card Number, Expiry Date, Name, and CVV
- Bank Account Number and Sort Code
- Billing Address Details

Payment information will *not* be stored by Impact Culture at any time.

Online module purchases are conducted through a third-party, *Thinkific*. For details on their policy, please visit their site [here](#)

## **2. Data Usage**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To provide access to the service you have purchased or opted in for.
- To track unique traffic.
- To complete an audit and any following training sessions and to relay attendance and completion information to any employers where they have signed up as part of your employment.

If you are the recipient of multiple services from us, *Thinkific* may also hold relevant parts of your data in order to provide access to online learning content.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting us at [chaka.bachmann@impactculture.co.uk](mailto:chaka.bachmann@impactculture.co.uk)
- We have a contractual obligation.
- We have a legal obligation.
- We have a vital interest.
- We have a legitimate interest.

### **3. Data Storage**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, 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 a duty of confidentiality.

Any data collected in surveys is subject to the measures described in section 1 above.

Raw data provided for audit purposes, evaluation surveys and other client specific projects are typically retained for six months after the project ends. Other stored data will be reviewed every 5 years and where appropriate deleted. If requested, and the data is no longer required to provide the services listed previously, we try our best to comply with data removal requests but will continue to store archived copies of your Personal Information for legitimate business purposes and to comply with our legal and regulatory obligations.

We do not and will never share, disclose, sell, rent, or otherwise provide Personal Information to other companies for the marketing of their own products or services. Some personal information may be shared with *Thinkific* to provide access to online module content. You can read their privacy policy [here](#).

#### **4. Data Rights**

Under data protection law, you have rights including:

**Your right of access** – You have the right to ask us for copies of your personal information.

**Your right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** – You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [chaka.bachmann@impactculture.co.uk](mailto:chaka.bachmann@impactculture.co.uk) if you wish to make a request.

## **5. Contact Information**

If you have any concerns about our use of your personal information, you can make a complaint to us at [chaka.bachmann@impactculture.co.uk](mailto:chaka.bachmann@impactculture.co.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF