

## Privacy Notice for Culture & Clarity Ltd Effective date: 26 April 2026

At Culture & Clarity, we believe clarity and trust are the foundation of strong relationships — including how we handle your personal information. This Privacy Notice explains how Culture & Clarity Ltd collects, uses, and protects your personal data when you visit our website, book a discovery call, request our free Team Culture & Psychological Safety Audit, sign up for our newsletter, or otherwise interact with us.

We are committed to being transparent, human-centred, and fully compliant with UK data protection law (UK GDPR and the Data Protection Act 2018).

### 1. Who we are

**Data Controller:** Culture & Clarity Ltd **Company Registration:** 16795837 (England and Wales) **Registered address:** 28 Maxwell Drive, Kingstown, Carlisle, CA6 4EB **Contact email:** [admin@cultureclarity.uk](mailto:admin@cultureclarity.uk)

If you have any questions about this notice or how we handle your data, please contact us using the details above.

### 2. What personal data we collect

We may collect the following categories of personal data:

- **Identity and contact data:** name, job title, company name, email address, phone number (if provided).
- **Enquiry and service data:** messages, details about your team or leadership challenges, preferences for keynotes, workshops, content creation, or sponsorship.
- **Technical data:** IP address, browser type, device information, pages visited, and time spent on the site (via cookies and analytics tools).
- **Marketing data:** whether you have opted in to receive our newsletter, thought-leadership updates, or event invitations.

We do **not** collect special category data (such as health or ethnicity data) unless you voluntarily share it in the context of a workshop or consultation, in which case we will ask for your explicit consent.

### 3. How we collect your data

- Directly from you when you complete a contact form, discovery call booking form, free audit request, newsletter signup, or email us.
- Automatically through cookies and similar technologies when you browse our site.
- Occasionally from public sources (e.g. LinkedIn) if you engage with our content or request information.

### 4. How and why we use your personal data (and our lawful basis)

We only process your data where we have a lawful basis to do so. The table below summarises our main purposes:

<b>Purpose</b>	<b>Lawful Basis</b>
Responding to your enquiries, booking discovery calls, or delivering the free Team Culture & Psychological Safety Audit	Legitimate interests (to provide the service you requested) or contract (if you engage our services)
Providing our services (keynotes, workshops, ghostwriting, training)	Contract (performance of our agreement with you or your organisation)
Sending you our newsletter, thought-leadership content, or relevant updates	Consent (you can unsubscribe at any time) OR legitimate interests (for existing clients or those who have shown interest in our work)
Improving our website, understanding audience behaviour, and measuring content performance	Legitimate interests (running and improving our business)
Complying with legal obligations (e.g. record-keeping, tax, or anti-money laundering if applicable)	Legal obligation
Defending legal claims or protecting our rights	Legitimate interests

## 5. Who we share your data with

We only share your data with trusted third parties where necessary and always under contracts that protect your privacy:

- **Service providers** (data processors): email marketing platforms (e.g. for newsletters), website analytics providers (e.g. Google Analytics), booking/scheduling tools (if used), and secure cloud storage.
- **Professional advisers**: accountants, lawyers, or insurers where required.
- **Social media platforms**: when you interact with our embedded YouTube, LinkedIn, or X content (subject to their own policies).

We do **not** sell your personal data to third parties for marketing purposes.

## 6. International transfers

All our primary data processors are based in the UK or EEA. Where any transfer outside the UK/EEA occurs, we ensure appropriate safeguards are in place (e.g. Standard Contractual Clauses or UK International Data Transfer Agreement).

## 7. How long we keep your data

We retain your personal data only for as long as necessary:

- Enquiry/lead data: up to 3 years after last contact (unless you become a client).
- Client service data: for the duration of our relationship plus up to 7 years for legal/tax purposes.
- Newsletter subscribers: until you unsubscribe.

- Technical/analytics data: automatically deleted or anonymised after the period set by the tool (usually 14–26 months).

## **8. Your legal rights**

Under UK GDPR you have the right to:

- Access your personal data
- Correct inaccurate data
- Request erasure (“right to be forgotten”)
- Restrict or object to processing
- Data portability (in certain cases)
- Withdraw consent at any time (where consent is our basis)

To exercise any of these rights, simply email us at the address above. We will respond within one month (free of charge, unless your request is excessive). You also have the right to complain to the UK Information Commissioner’s Office (ICO) at [ico.org.uk](https://ico.org.uk).

## **9. Cookies and tracking technologies**

Our website uses cookies to:

- Make the site function properly (essential cookies)
- Analyse traffic and improve user experience (analytics cookies)

You can manage or reject cookies through your browser settings or our cookie banner (if implemented). For more details see our separate [Cookie Policy] (link to be added).

## **10. Data security**

We use appropriate technical and organisational measures (encryption, secure servers, access controls) to protect your data. However, no system is completely secure, so we cannot guarantee absolute security.

## **11. Children’s data**

Our website and services are not directed at children under 18. We do not knowingly collect data from children.

## **12. Changes to this Privacy Notice**

We may update this notice from time to time. The latest version will always be posted here with the updated effective date. We will notify you of significant changes (e.g. via email if you are a subscriber).

## **13. Contact us**

If you have any questions or concerns about this Privacy Notice or our data practices, please reach out: Email: [Insert email] Post: 28 Maxwell Drive, Kingstown, Carlisle, CA6 4EB

Thank you for trusting Culture & Clarity with your information. We're here to help leaders stay human — and that includes treating your data with care, respect, and clarity.