



## PRIVACY POLICY

### ABOUT US

Twist & Shout Communications Limited ("We") are committed to protecting and respecting your privacy. For the purposes of the relevant data protection legislation, the "controller" is Twist & Shout Communications Limited, LCB Depot, 31 Rutland Street, Leicester LE1 1RE. We can be contacted at [anyone@twistandshout.co.uk](mailto:anyone@twistandshout.co.uk) or +44(0)844 800 0662.

This Privacy Policy aims to give you information on how Twist & Shout Communications Limited collects and processes your personal data through use of our website, signing up to our newsletter, purchasing our products, as well as any personal data you provide us during events and networking.

Please note that this document should also be read in conjunction with our Website Usage Policy. If you have any questions on this Privacy Policy or on any other of our listed legal documents, please get in touch.

### TYPES OF PERSONAL DATA WE COLLECT

We may collect, use, store and transfer different kinds of personal data about you, as follows:

- Your name, address, email address, telephone number, and other contact information,
- Details of payments that you make to us, and (where applicable) payment card details are held by a third party provider, information about billing and payment history.
- The preferences you provide to us confirming whether you would like us to contact you with information and offers that may be of interest to you; and information about what products and services you have ordered in the past
- We do not collect any special categories of personal data or personal data relating to children.

The minimum information that we need from you so that you can place an order is your name, address, email address, telephone number, and payment details. If this data is not

supplied, we will be unable to process the order. We need to retain contact information in order to fulfil the terms of the contract which is based on a three year licence and may include a renewal at the end of licence period. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **WHEN DO WE COLLECT INFORMATION**

You may give us your name, contact details, payment details, and interest preferences by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you subscribe to our newsletter or meet face to face during events and networking.

Our website does not use cookies to collect your data.

We may receive personal data about you from various third parties *[and public sources]* as set out below:

- Analytic providers, suppliers, event networks, and social media.

## **WHY DO WE COLLECT INFORMATION**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances, and on the following lawful bases:

- Where we need to perform the contract, we are about to enter into or have entered into with you, we will need to process your name, address, email address, telephone number, and other contact details, as well as payment details.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, we will need to process your name, address, email address, telephone number, and other contact details.
- Where we need to comply with a legal or regulatory obligation.

## **WHEN WILL WE SHARE YOUR PERSONAL DATA?**



We shall not share your personal data with any third parties for marketing purposes without your express consent. We shall however, share your personal data with third parties for the following reasons:

- We will share your card payment details via WorldPay, a third party supplier, in order to process card payments. WorldPay will store and process payment details which include card holder name, email address, address and card payment details.
- WorldPay will ensure that where Transaction Personal Data is transferred out of the European Union ("EU") or the European Economic Area ("EEA") it shall do so in a manner which demonstrates compliance with Data Protection Legislation.

We reserve the right to disclose or share your personal data in order to comply with any legal requirements, enforce our terms and conditions, or any other agreement we enter into with you, or to protect the rights, property, or safety of our business and other customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **WHERE WILL WE STORE YOUR PERSONAL DATA?**

We store your details onsite in secured premises. We also store some personal data on third party cloud based platforms including Sage, HighRise, and Direct Mail. These third parties are all fully compliant with GDPR regulations. 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. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **HOW LONG WILL WE KEEP HOLD OF YOUR PERSONAL DATA**

How long we store your personal information depends upon the type of information we are holding and the purpose for which we need it.

We shall keep your data for the period of time you hold an account with us, to enable us to contact you, keep a record of your past orders and supply you with any new orders. We

shall not keep your personal information for any longer than necessary to fulfil our obligations to you or to meet our legitimate business interests or legal requirements. This will usually last the length of the contract licence (three years), unless the client requests to renew the licence for a further three year period.

Where you have given us your permission to contact you for marketing purposes, we shall contact you every 3 years from the date on which you originally gave your permission to ensure that you still wish to be contacted in this way.

## **YOUR RIGHTS**

Under certain circumstances, you have the following rights:

- to request that we provide you with a copy of the information we hold about you (“Access Request”);
- to request that we rectify any information we hold about you (“Right to Rectification”);
- to request that we erase any information we hold about you (“Right to be Forgotten”);
- to restrict the level of processing we carry out with your information (“Restriction of Processing”);
- to obtain from us all personal data we hold about you in a structured, machine readable form, and have this information transmitted to another organisation (“Data Portability”);
- to object to our processing your information in certain ways (“Right to Object”); and
- to withdraw your consent at any time to our processing of your data.

We shall comply with any request made under this section as soon as possible, and normally within one month from the date of your request. However, if necessary, for example if your request is particularly complex or we receive a number of similar requests, we may extend this period by an additional two months, but we shall notify you if we need to do this.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). Please note that where we receive requests under this section which are manifestly unfounded or excessive, for example because they are repetitive in nature, we may charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested or refuse to act on the request.



You can find out more about or exercise any of the above rights by emailing us at [anyone@twistandshout.co.uk](mailto:anyone@twistandshout.co.uk). You also have the right to lodge a complaint with the Information Commissioners Office if you are unhappy in any way with how we treat your personal information.

### **THIRD PARTY WEBSITES**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.