

Privacy Policy

Last updated March 2026.

We respect your privacy and are committed to protecting your personal data. This policy explains the terms on which we collect and process your personal data, and how we protect your personal data when you visit our website at <https://clusivity.io/>, <https://growthisevent.com/>, contact us, visit any other website, platform or service operated by us under the Clusivity and Grow This Event and Ezna brands, or otherwise engage us for our services. In addition, it explains your privacy rights and how the law protects you.

1. Who we are

We are Clusivity Ltd, a company registered in England and Wales. Our company number is 13858199 and our registered office is at 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ (“we”, “us” or “our”).

Clusivity Ltd operates the brands Clusivity and Grow This Event. References in this policy to “we”, “us” or “our” include services, websites and platforms provided under those brands.

We comply with our obligations under the Data Protection Act 2018, the EU law retained version of the General Data Protection Regulation (EU) (2016/679) (“data protection laws”). If any of these laws are replaced or superseded, we will also comply with those.

We are registered with the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (<https://ico.org.uk/>), and our registration reference number is ZB403443. You have the right to make a complaint at any time to the ICO, however, we appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance by emailing andrew.carney@clusivity.io.

2. The data we may collect about you

Personal data/information means any information about an individual from which that person can be identified. It doesn’t include anonymous data. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Transaction Data** includes details about payments to and from you and other details of the services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.

- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Category Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, disability/long-term health conditions, caring responsibilities and social mobility..

Aggregated Data such as statistical or demographic data for any purpose, isn't considered personal data in law as this data will **not** directly or indirectly reveal your identity to us. We may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

3. **How is your personal data collected?**

We may use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact by filling in forms or by corresponding or engaging with us by post, phone, email, social media, and when you engage in activities on our website or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources, such as Google, Companies House, or the electoral register.

4. **How we use your personal data**

We will only use your personal data when we can rely on a legitimate (lawful) basis, such as:

- **Consent:** we may ask for you to consent to certain activities when you engage with us; we will only use your personal data for the explicit purposes for which you have consented to. You can withdraw your consent at any time.
- **Contract:** Where we need to perform the contract, we are about to enter into or have entered into with you.
- **Legitimate Interests:** 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.
- **Legal Obligation:** Where we need to comply with a legal obligation.

5. **Purposes for which we will use your personal data**

We have set out below the ways we may use your personal data, and which of the legitimate bases we rely on to do so:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to submit an enquiry to us, whether via email, through our website or via social media, including but not limited to LinkedIn, Facebook and Instagram.	Identity Contact	Contract Legitimate Interests (to enable us to respond to your enquiry)
To facilitate account creation and logon process	Identity Contact	Contract Legitimate interest (to allow us to facilitate account creation and logon process for the performance of the contract).
To process and deliver the services	Identity Contact Special category	Consent Contract Legitimate Interest (to allow us to provide you with services)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy and cookie policy (b) send you information in regards to changes to our terms, conditions, and policies (c) asking you to leave a review, for feedback or to take a survey	Identity Contact Profile Marketing and Communications	Contract Legal Obligation Legitimate Interest (to keep our records updated and to study how customers use our services)
To respond to user inquiries/offer support to users	Identity Contact	Contract Legitimate Interest (to use your information to respond to your inquiries and solve any potential issues you might have with the use of our services).
To manage user accounts	Identity Contact	Legitimate Interests (to use your information for the purposes of managing our account and keeping it in working order).

To enable you to register for our mailing list/email marketing	Identity Contact Marketing and Communications	Legitimate Interests (to enable us to provide you with the newsletter/email marketing and present you with information, or services we consider you will be interested in)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Legal Obligation
To send you marketing and promotional communications.	Marketing Identity Contact	Consent (we and/or our thirdparty marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time by contacting us)

6. Marketing

You may receive marketing communications from us if you have requested information from us or purchased services from us and you haven't opted out of receiving that marketing. We will get your consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this won't apply to personal data provided to us as a result of a purchase, warranty registration, or other transactions.

7. Anonymised Surveys

We may collect and use your data for the purpose of conducting anonymous surveys in the provision of our services. Please be assured that during this process we do not process any personal information that can identify you and we ensure the protection of your personal information.

8. Pseudonymised surveys

We may collect and use your personal data for the purpose of conducting pseudonymised surveys in the provision of our services. During this process we do collect personal information and special category data such as name, email address, gender, race, ethnicity, sexual orientation, disability, socioeconomic background, age, religion, caring responsibilities, which is used to determine diversity in the workplace. All data collected during these surveys are strictly pseudonymised to protect your privacy.

9. Disclosure of your personal data

We may disclose your information in the following cases:

- If we want to sell our business, or our company, we can disclose it to the potential buyer
- We can disclose it to other businesses in our group, as defined in the UK Companies Act 2006
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety, or rights
- We can exchange information with others to protect against fraud or credit risks.

We may contract with third parties to supply services to you on our behalf. These include:

- Credit card processing services
- Order fulfilment service providers
- Analytics service providers
- Event/campaign management service providers
- Website management service providers
- Information technology and related infrastructure provision
- Email delivery services
- Our auditors and legal advisors.

It is important to note that they are bound by data protection obligations. We do this to ensure that your personal data is kept safe.

10. Data Security

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data we collect. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business 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.

If there is an incident where we become aware that there has been a data breach, we will let you know without undue delay. We will then take all necessary steps, including informing the ICO, to limit the extent of the breach and to prevent a further reoccurrence.

11. International transfers

We may transfer your personal data outside of the European Economic Area (EEA) or the UK where we engage third parties to provide services on our behalf, such as to receive services or deal with payment. Whenever we transfer your personal data out of the EEA or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data
- where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or the UK.

12. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

13. Your legal rights

Under certain circumstances, you have rights under the data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us by emailing info@clusivity.io.

You won't have to pay a fee to access your personal data (or to exercise any of the other rights), but we can charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive, or we can refuse to comply in these circumstances.

We may need you to provide evidence of your identity as a security measure and we may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month, but it could take longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. Notice for California residents of privacy practices and rights

If you are a California resident, California law may provide you with additional rights regarding your personal data. The CCPA gives you the following rights:

- Right to know about the personal information we collect and share:
 - The CCPA gives you the right to request that we disclose the specific pieces of personal information we have collected about you
 - Please see above for information on the data we collect on you, and how we process it
 - We don't sell your personal information. However, we do disclose your personal data to limited third parties, as described above.
- Right of deletion:
 - You have the right to request that we delete your personal information, subject to certain exceptions
- If you wish to delete your personal data, please contact us at info@clusivity.io . Please note that we may require certain information from you in order to verify your identity before proceeding with your request.

We collect the categories of personal information from you in connection with your use of our website as described above. We will not discriminate against you for exercising any of your CCPA rights.

15. Third party links

This policy only relates to our website and services. We might have links on/within our services to other websites, and these websites will have their own terms and conditions and privacy policies. You should check those privacy policies before providing your personal data to those websites.

16. Changes to this policy

We can update this policy from time to time as laws change or as our website or services change. If we make material changes to this policy, and we need your consent to those changes, we will contact you by email to do so.