



Privacy Policy

Last updated: December 2025

Plain-English summary

We believe in being open and inclusive about how we use personal data.

In short:

- We collect only the information we need to run our services, communicate with our community, and manage professional relationships.
- We use your data fairly, lawfully and transparently.
- You are always in control of your information and have clear rights over how it is used.
- We sometimes use trusted third-party tools (for example, website plug-ins for ecommerce or newsletters) to help us operate efficiently.
- We take reasonable steps to keep your data secure and review our systems regularly.

This full Privacy Policy explains the detail behind these commitments.

1. Who we are

Data Controller:

Rethink Creative (trading name)

Rethink Creative is a partnership between **Michael Gubbins** and **Pauline Burt**, operating as individual freelancers trading as **Rethink Creative**. Rethink Creative is **not a separate legal entity**.

For the purposes of data protection law, **Rethink Creative is the Data Controller** in relation to personal data collected and processed under this Privacy Policy.

Contact for data protection queries:

- Michael Gubbins.
- Michael.gubbins@rethinkcreative.biz
- 263 Rugby Road, Leamington Spa, CV32 6EB, UK



Rethink Creative is based in the United Kingdom and is subject to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. As we operate online, our activities may involve individuals, organisations and partners located outside the UK.

2. The personal data we collect

We may collect and process the following categories of personal data:

a) Identity and contact information

- Name
- Email address
- Postal address
- Telephone number
- Organisation and job title
- Social media handles or profile information (where you interact with us)

b) Engagement and communications data

- Newsletter sign-ups and preferences
- Communications with us (emails, messages, enquiries)
- Feedback, survey responses and consultation input • Event registrations and attendance

c) Transactional and financial data

- Billing address
- Payment information (including bank account details where relevant) • Records of products or services purchased or supplied

d) Professional and organisational data

- Information provided by suppliers, partners, financiers and collaborators
- Due diligence, contracting and compliance information
- Professional biographies, statements or credentials you choose to share

e) Special category data (where applicable)

From time to time, we may process **special category personal data**, for example:

- Information about protected characteristics (such as gender, ethnicity, disability or age) shared voluntarily in the context of equality, diversity and inclusion monitoring, research, funding, or evaluation



- Accessibility requirements

We only collect and use special category data where it is necessary, lawful and subject to appropriate safeguards.

f) Technical and usage data

- IP address
 - Browser and device information
 - Website usage data via cookies or similar technologies (see Section 9)
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3. How we collect personal data

We collect personal data when you:

- Follow or interact with our social media accounts
 - Subscribe to our newsletter or mailing lists
 - Purchase or enquire about our products or services
 - Supply goods or services to us
 - Enter into a partnership, funding or professional relationship with us
 - Participate in research, consultation, events or programmes
 - Communicate with us directly
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4. How we use your personal data

We are committed to working in an inclusive, fair and transparent way. We only use personal data where it is necessary, proportionate and clear to those whose data we hold.

We use personal data for the following purposes:

- To provide and manage our products and services
- To communicate with you about our work, opportunities and updates
- To manage professional, supplier, partner and financier relationships
- To process payments and manage accounts
- To deliver newsletters, marketing or thought leadership (where permitted)
- To conduct research, evaluation, consultation and impact reporting
- To monitor and support equality, diversity, inclusion and access, where data is provided voluntarily and used responsibly
- To comply with legal, regulatory and funding obligations
- To protect our legitimate business interests and manage risk



5. Lawful bases for processing

Under the UK GDPR, we rely on one or more of the following lawful bases:

- **Consent** – where you have actively agreed (e.g. newsletter sign-up, optional monitoring data)
- **Contract** – where processing is necessary to deliver a product, service or agreement
- **Legal obligation** – where required by UK law or regulation
- **Legitimate interests** – where processing is necessary for our operations and does not override your rights
- **Substantial public interest or explicit consent** – for special category data, where applicable

Where individuals are located in the European Economic Area (EEA), we also rely on equivalent lawful bases under the EU GDPR.

6. Sharing your personal data

We may share personal data with:

- Trusted service providers (for example, website hosting services, WordPress plug-ins, payment processors and mailing list platforms)
- **Script to Screen Ltd**, a UK-based private limited company, which processes payments on our behalf
- Professional advisers (legal, financial, audit)
- Funders, partners or commissioners where required for delivery, monitoring or reporting
- Regulatory or public authorities where legally required

Where payments are made through our website, payment details are collected via an ecommerce plug-in and payments are received by **Script to Screen Ltd on behalf of Rethink Creative**. Script to Screen Ltd applies its own privacy and security standards, which are consistent with this Privacy Policy, and only processes personal data necessary to provide payment services.

Pauline Burt is a Director of Script to Screen Ltd. This relationship does not affect our commitment to handling personal data lawfully, fairly and transparently.



7. International data transfers

As an online-based partnership, personal data may be accessed or processed by individuals or service providers located outside the UK.

Where personal data is transferred outside the UK, including to the European Economic Area (EEA) or other jurisdictions, we ensure appropriate safeguards are in place, such as:

- UK adequacy regulations
- International Data Transfer Agreements (IDTAs)
- Addenda to EU Standard Contractual Clauses (SCCs)

These safeguards are designed to ensure your personal data remains protected to a standard equivalent to UK data protection law.

8. Data retention

We retain personal data only for as long as necessary for the purposes for which it was collected, including legal, financial and reporting requirements. Retention periods vary depending on the nature of the data and relationship.

9. Cookies and tracking

Our website and digital platforms may use cookies or similar technologies to:

- Improve functionality and user experience
- Understand how our content is used
- Support communications and marketing

You can control cookies through your browser settings and, where applicable, our cookie banner or preferences tool.

10. Your rights

You have rights under data protection law, including the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data



- Restrict or object to processing
- Withdraw consent at any time (where consent is the lawful basis)
- Request data portability
- Lodge a complaint with the Information Commissioner's Office (ICO)

To exercise your rights, please contact us using the details in Section 1.

11. Data security

We take appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access or disclosure.

As part of operating online, we use **third-party service providers**, including website hosting services and WordPress plug-ins used for e-commerce, payment processing, analytics and newsletter sign-ups. These third-party providers may change from time to time as we review and improve our systems.

Where we use third-party providers, we:

- Select providers that offer appropriate data protection and security assurances
- Limit access to personal data to what is necessary for the service provided
- Rely on contractual, platform-based or statutory safeguards where required

Where payments are processed by Script to Screen Ltd on our behalf, Script to Screen Ltd applies its own privacy and security standards, consistent with this Privacy Policy.

While no system can be guaranteed to be completely secure, we work to ensure that any personal data we handle is protected in line with UK data protection law.

12. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our activities, services, legal structure or legal requirements.

Future changes to our legal structure

Rethink Creative is currently operated by individual freelancers trading under a shared name. If we establish a separate legal entity in the future (for example, a limited company or LLP), this Privacy Policy will be updated to reflect:

- the identity of the new legal entity;



- any changes to data controller responsibilities;
- and any material changes to how personal data is processed.

Where such changes occur, we will update this Privacy Policy and make the revised version available on our website.