

Privacy Policy (GDPR)

Who We Are (Data Controller)

This website is operated by Aeorema Ltd T/A Cheerful Twentyfirst (referred to as “Cheerful Twentyfirst”, “we”, “us”, or “our”), part of Aeorema Communications plc. We are registered in England and Wales under Company Registration Number 03071929, with our registered office at 101 New Cavendish Street, London W1W 6XH, UK

Cheerful Twentyfirst is the Data Controller responsible for your personal data collected through this website. If you have questions regarding this policy or how we handle your information, please contact our Data Privacy Lead at privacy@cheerfultwentyfirst.com.

Activity / Purpose	Categories of Personal Data	Lawful Basis (UK GDPR Article 6)	Retention Period
Enquiries & Contact Form Submissions	Name, business email, phone number, company name, and message details.	Legitimate Interests (Art. 6(1)(f))—to respond to prospective clients and commercial enquiries.	12 months after enquiry resolution, unless converted to a client contract.
Newsletter / “Subscribe” Form	Name, work email address, company name, and marketing preferences.	Consent (Art. 6(1)(a))—via website opt-in checkbox.	Until unsubscribed, plus 30 days to suppress.
Website Cookies & Analytics (Google Analytics, HubSpot, LinkedIn pixels)	IP address, device metadata, cookie IDs, and page interaction logs.	Consent (Art. 6(1)(a))—gathered through our CookieYes banner.	Per cookie duration schedule (session up to 13 months).
Client Event Delivery & Account Management	Contact details, job title, billing address, and operational correspondence.	Contract Performance (Art. 6(1)(b))—necessary to deliver contracted services.	Duration of contract + 7 years for statutory accounting records.
Recruitment & Speculative CVs	Full name, CV, employment history, and portfolio links.	Legitimate Interests (Art. 6(1)(f))—evaluating prospective candidates.	6 months from the hiring decision unless consent is given to retain longer.

Where we rely on Legitimate Interests (Article 6(1)(f)), our interest is the day-to-day administration, security, and commercial growth of Cheerful Twentyfirst, including responding efficiently to prospective client requests and

Privacy Policy (GDPR)

industry enquiries. We balance these interests against your fundamental privacy rights to ensure no disproportionate impact.

Cookies and Similar Technologies

Our website uses cookies and similar tracking technologies to ensure site security, enhance user experience, and analyse website performance. Cookies are categorised as follows:

Strictly Necessary: Essential for basic site security, page navigation, and load balancing (e.g., Cloudflare security tokens, CSRF tokens).

Cookie	Duration	Description
VISITOR_PRIVACY_METADATA	6 months	YouTube sets this cookie to store the user's cookie consent state for the current domain.
__hssrc	Session	Set by HubSpot whenever it changes the session cookie. Set to 1, it indicates the browser was restarted; if missing, it is treated as a new session.
__hssc	1 hour	HubSpot sets this cookie to keep track of sessions and determine if session numbers and timestamps in __hstc should increment.
li_gc	6 months	LinkedIn sets this cookie to store visitor consent regarding cookie usage for non-essential purposes.
cookieyes-*	1 year	CookieYes sets this cookie for cookie consent banner and solution management.
cookietest	Session	Used to determine whether the user's browser accepts cookies; essential for site functionality and UX.

Functional: Used to remember preferences and support interactive media playback (e.g., embedded YouTube video preferences).

Functional Cookie	Duration	Description
__cf_bm	1 hour	Set by Cloudflare to support Cloudflare Bot Management and protect against malicious traffic.
__Secure-ROLLOUT_TOKEN	6 months	Set by YouTube to manage and remember user preferences, maintain session security, and track interactions or playback settings when viewing embedded YouTube videos.

Privacy Policy (GDPR)

__Secure-YEC	Session	Set by YouTube to manage user preferences, maintain session security, and track interactions or playback settings on embedded videos.
__Secure-YNID	6 months	Set by YouTube to manage preferences, maintain session security, and track interactions on embedded video content.
lidc	1 day	LinkedIn sets this cookie to facilitate data center selection and route server requests efficiently.
ytidb::LAST_RESULT_ENTRY_KEY	Persistent (never expires)	Stored by YouTube to remember the last search result clicked, improving future search relevance.
mid	1 year 1 month 4 days	Set by Instagram to personalise user experience by remembering preferences and settings.

Analytics & Performance: Used to collect aggregated metrics on visitor counts, bounce rates, and traffic sources (e.g., Google Analytics, HubSpot).

Analytics Cookie	Duration	Description
_ga	1 year 1 month 4 days	Installed by Google Analytics; calculates visitor, session, and campaign data, storing information anonymously via a unique random ID.
_gid	1 day	Installed by Google Analytics; tracks page views and creates anonymous analytics reports on user interactions.
_gat_gtag_UA_*	1 minute	Google Analytics sets this cookie to store a unique user ID and throttle request rate.
ga*	1 year 1 month 4 days	Set by Google Analytics 4 (GA4) to store and count unique page views.
__hstc	6 months	Main HubSpot visitor-tracking cookie containing domain, visit timestamps (initial, last, current), and session count.
hubspotutk	6 months	Set by HubSpot to monitor visitors; passed on form submission to deduplicate contacts.

Privacy Policy (GDPR)

Performance Cookie	Duration	Description
__Secure-BUCKET	6 months	Stores an anonymised bucket identifier to group traffic for experiments, optimise content delivery, measure performance, and enhance reliability.

Advertisement & Targeting: Used to measure campaign effectiveness and deliver relevant content (e.g., LinkedIn Insight Tag).

Advertisement Cookie	Duration	Description
YSC	Session	Set by YouTube to track views and user interactions with embedded video players.
VISITOR_INFO1_LIVE	6 months	Set by YouTube to measure bandwidth and determine whether to deliver the modern or legacy player interface.
bcookie	1 year	LinkedIn browser identifier cookie set via share buttons and ad tags for tracking ad conversion and interaction.
_gcl_au	3 months	Set by Google Tag Manager to experiment with and evaluate advertising efficiency across participating sites.

We only deploy non-essential cookies with your prior consent. You can inspect the complete, live list of individual cookies, their specific providers, purposes, and retention durations, or modify your choices at any time by clicking the 'Revisit Consent' / 'Cookie Settings' widget located in the bottom corner of your screen.

Third Party Processors

We share data with trusted third-party service providers who act as data processors under strict contractual obligations. Key provider categories include:

- **CRM & Marketing Platforms:** HubSpot
- **Cloud Infrastructure & Email:** Google Workspace, Cloudflare
- **Website Analytics & Advertising:** Google Analytics, LinkedIn Insight Tag
- **Consent Management:** CookieYes
- **Corporate Group:** Aeorema Communications plc entities for central administration.

Privacy Policy (GDPR)

International Data Transfer

Because Cheerful Twentyfirst operates across London, New York, and global event destinations, your personal data may be transferred to and stored in jurisdictions outside the UK or European Economic Area (EEA). When transferring data internationally, we ensure adequate protections are in place by relying on UK International Data Transfer Agreements (IDTAs), UK Addendums to EU Standard Contractual Clauses (SCCs), or statutory adequacy decisions.

Your Rights Under Data Protection Law

Under UK data protection law, you have enforceable rights regarding your personal information, including:

- The right to access your personal data (Subject Access Request).
- The right to rectify inaccurate or incomplete records.
- The right to request erasure ('right to be forgotten').
- The right to restrict or object to our processing (including direct marketing).
- The right to data portability.
- The right to withdraw consent at any time (e.g., via the unsubscribe link in our newsletters or via the cookie settings widget).

To exercise any of these rights, please email our privacy team at privacy@cheerfultwentyfirst.com.

How We Handle Rights Requests & Response Timeframes

- **No Fee:** You will not have to pay a fee to access your personal data or exercise any statutory rights. However, we may charge a reasonable fee or refuse to act if your request is clearly unfounded, repetitive, or excessive.
- **Response Timeframe:** We respond to all legitimate requests within one calendar month of receipt. If your request is complex or you have submitted multiple requests, this period may be extended by up to two further months. Where an extension is needed, we will notify you within the initial month and provide an explanation for the delay.
- **Identity Verification:** To safeguard your personal data, we may need to request specific information from you to help us confirm your identity before releasing any records.



Privacy Policy (GDPR)

Supervisory Authority (ICO) Contact Details

If you have concerns about how we handle your personal data, you have the right to lodge a complaint with the UK supervisory authority:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Website: www.ico.org.uk | Helpline: 0303 123 1113.