

PRIVACY POLICY

This document details Lux Consulting Ltd's Privacy Policy in line with the General Data Protection Regulation (GDPR).

Lux Consulting Ltd is committed to protecting your personal data and respecting your privacy. This privacy notice will inform you of how we use and look after your personal data.

Lux Consulting Ltd is a Data Controller and we collect, store and use the personal information of our clients to enable us to provide the services that have been requested of us.

This version was last updated on 25th May 2018

1. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified, such as:

- **Identity data** including first, last and middle names
- **Contact data** including address, email address, telephone numbers
- **Professional data** including any information we may collect in the course of providing our services to you.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with an answer to an enquiry). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

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.

2. HOW YOUR PERSONAL DATA IS COLLECTED

The personal information that we process has been obtained directly from the data subject themselves or via a third party who use our services. The data may have been given over the telephone, via email or letter, business card or through a contact form that has been filled out.

3. HOW WE USE YOUR PERSONAL DATA

We only use your personal data where the law allows. The following are the Lawful Basis for processing personal information: consent; contract; legal obligation; vital interests; public task; and legitimate interest. The Lawful Basis upon which we will use your personal data is for contracts.

We will use your data to communicate and manage our relationship with you. We may need to contact you by email or telephone for administrative or operational purposes. This communication is purely operational in nature and not conducted for marketing purposes.

We may wish to inform you of news or services that may interest you. If we do that, we will ensure that you have the option to unsubscribe from future contact at any time and respect your wishes by removing your details from our database.

We will also use your data to meet our administrative goals including accounting, billing, legal or contract purposes.

4. DATA SECURITY

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to your personal data is limited to 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.

5. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Lux Consulting Ltd will retain the personal data of clients for the duration of time that a client uses our services. Should a client no longer wish to remain a potential client for

future engagements, then this information and any associated documentation will be permanently deleted and/or destroyed by Lux Consulting Ltd.

Where the law requires it, copies of accounts or other information may be kept on file/in storage for a period of seven years, after which it will be deleted and/or destroyed.

6. YOUR LEGAL RIGHTS

The GDPR includes the following rights for individuals:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision-making including profiling.

You also have the right to request a copy of all the personal information that is processed by Lux Consulting Ltd and upon request will receive a report containing this information free of charge. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If you wish to exercise any of the rights set out above, please contact us.

As a security measure, we may need to request certain information from you to help us confirm your identity and ensure your right to access your personal data. We aim to respond to all legitimate requests within one month.

Individuals have the right to complain to the ICO (www.ico.org.uk) if they think there is a problem with the way their data is being handled by Lux Consulting Ltd.