

CUSTOMERS AND SUPPLIERS PRIVACY POLICY

1. GENERAL

- 1.1 Lucra Ltd (“we” “us” “our”) is committed to protecting and respecting your privacy. We are the data controller and will process your personal data in accordance with the Data Protection Act 1998 as amended or replaced by the General Data Protection Regulation 2016 and any national laws which relate to the processing of personal data (“**data protection legislation**”).
- 1.2 Please read the following carefully to understand our views and practices regarding Your Data and how we will treat it.

This policy applies to information we collect about:

- Visitors to our website(s)
- Customers
- Introducers
- Suppliers

2. VISITORS TO OUR WEBSITES

- 2.1 We may collect and process personal data about you in the following circumstances:
- 2.1.1 when you complete the online contact forms on our website (“**Site**”) providing us with your name, address, email address and contact number;
- 2.1.2 whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;
- 2.1.3 when you visit our Sites we will retain details such as traffic data, location data, weblogs and other communication data, and the resources that you access (see section 2.2.2 on Cookies below); and
- 2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our Sites.
- 2.2 We may also collect data in the following ways:

IP Address

- 2.2.1 We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device’s operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns, and does not identify any individual.

Cookies

- 2.2.2 Our Sites uses cookies to distinguish you from other users of our Sites. This helps us to provide you with a good experience when you browse our Sites and also allows us to improve our Sites. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy <http://www.lucra.org/cookies-policy/>

- 2.3 We may use your personal data for our legitimate interests in order to:

- 2.3.1 provide you with information, or services that you requested from us;
- 2.3.2 respond to an enquiry submitted via our online contact forms;
- 2.3.3 allow you to participate in interactive features of our Sites, when you choose to do so;
- 2.3.4 ensure that content from our Sites are presented in the most effective manner for you and for your device;
- 2.3.5 improve our Sites and services;
- 2.3.6 process and deal with any complaints or enquiries made by you; and
- 2.3.7 contact you for marketing purposes where you have signed up for these (see section 7 for further details).

Website Links

Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data and we do not accept any responsibility or liability for these policies. Please check before you submit your information to these websites.

3. CUSTOMERS

- 3.1 We will collect details such as name, address, email address, contact number, date of birth, national insurance number and financial information in order to provide services to customers. We may also receive details of credit checks undertaken where you have supplied these to us.
- 3.2 We will share customer personal information with our employees to manage our relationship with you and we will retain customer personal data for 80 years.
- 3.3 We will use your personal data provided to comply with our contractual obligations arising from the agreements we enter into with our Customers and share the data with financial institutions who can assist in the provision of financial services to customers including product providers, lenders, banks, insurers, fund managers, platform providers and third party para-planners (including Tenet* paraplayers).
- 3.4 We will use customer personal data for our legitimate interests including:
 - 3.4.1 sharing personal data with Tenet* as they are responsible for the services we provide to our clients and have a legal obligation to monitor our compliance with the FSMA and Financial Conduct Authority rules. Further details regarding how Tenet will use customer personal data can be found on it's website at www.tenetgroup.co.uk or by contacting Tenet on 01132390011;
 - 3.4.2 with your consent, marketing our other products and services by mail and email; and
 - 3.4.3 with your consent, obtaining your sensitive personal data from third parties including your health, ethnic origin, or criminal prosecutions from third parties such as employers and credit reference agencies, fraud prevention agencies and other similar organisations.
- 3.5 We will not transfer any customer personal data outside the European Economic Area ("EEA").

*Tenet means Tenet Group Limited, Tenet Limited, TenetConnect Limited, TenetConnect Services Limited, TenetLime Limited, its associated companies.

4. SUPPLIERS

We will collect details such as contact names, address, email address and telephone number in order to contact you about goods and/or services we have ordered from you, to comply with our contractual obligations and to place further orders. We may share your personal data with our employees to manage our relationship with you and we will keep your personal data for as long as we require your goods and/or services subject to a maximum of six years from the date of our last contact with you. We will not transfer your personal data outside the EEA.

5. MARKETING

- 5.1 We may use customer personal data to provide you with details about our *services, products, business updates and events* which we think may be of interest.
- 5.2 You have the right to opt-out of receiving the information detailed in section 7.1 at any time. To opt-out of receiving such information you can:
- 5.2.1 tick the relevant box situated in the form on which we collect your information;
 - 5.2.2 clicking the unsubscribe button contained in any such communication received; or
 - 5.2.3 e-mail us at info@lucra.org or call 0208 722 0734 providing us with your name and contact details.
- 5.3 Where you have subscribed to receive marketing correspondence from us we will keep your personal data for six years from when you subscribed to receiving marketing information from us or until you unsubscribe from receiving such correspondence from us (whichever is earlier).

6. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

- 6.1 In accordance with data protection legislation we are required to notify you of the legal basis upon which we process your personal data. We process your personal data for the following reasons:
- 6.1.1 for performance of a contract we enter into with you;
 - 6.1.2 where necessary for compliance with a legal obligation we are subject to; and
 - 6.1.3 for our legitimate interests (as described within this policy).
- 6.2 We will also process your personal data including personal sensitive data where we have obtained your explicit consent.

7. DISCLOSURE OF YOUR DATA TO THIRD PARTIES

- 7.1 In addition to the third parties mentioned previously in this policy, we may disclose your personal data to third parties for the following legitimate business purposes:
- 7.1.1 staff members in order to facilitate the provision of services to you;
 - 7.1.2 IT software providers that host our website and store data on our behalf; and
 - 7.1.3 to a prospective buyer of some or all of our business or assets, in which case personal data including Your Data will also be one of the transferred assets.
- 7.2 We may disclose your personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging

information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7.3 We will not sell or distribute your personal data to other organisations without your approval.

8. CROSS-BORDER DATA TRANSFERS

We do not transfer personal data outside the EEA. Where this is required in the future, we will ensure that safeguards are in place so that such transfers comply with data protection legislation.

9. DATA SECURITY

9.1 Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

9.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk.

10. ACCESS TO, UPDATING, DELETING AND RESTRICTING USE OF YOUR DATA

10.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.

10.2 Data protection legislation gives you certain rights in relation to your personal data. You have the right to object to the processing of your personal data in certain circumstances and to withdraw your consent to the processing of your personal data where this has been provided.

10.3 You can also ask us to undertake the following:

10.3.1 update or amend your personal data if you feel this is inaccurate;

10.3.2 remove your personal data from our database entirely;

10.3.3 send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract;

10.3.4 restrict the use of your personal data; and

10.3.5 provide you with access to information held about you and for this to be provided in an intelligible form.

10.4 We may request specific information from you to help us confirm your identity. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

10.5 Please send any requests relating to the above to our *Privacy Officer* at info@lucra.org specifying your name and the action you would like us to undertake. Note that in relation to requests to access personal data, we reserve the right to charge a reasonable fee to comply with your request.

11. RIGHT TO WITHDRAW CONSENT

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact us at info@lucra.org.

12. CHANGES TO OUR PRIVACY POLICY

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal without your knowledge or consent where required by applicable law or regulation.

13. CONTACT US

We have appointed a *Privacy Officer* to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our *Privacy Officer* at info@lucra.org. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>

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