



# Web Site (Internet) Privacy Policy

LUX GROUP HOLDINGS Limited (we) are committed to protecting and respecting your privacy.

This policy, together with any other documents referred to in it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By visiting this website, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 2018 (DPA) and General Data Protection Regulation (GDPR) (EU) 2016/679, the data controller is LUX GROUP HOLDINGS LIMITED, a company registered in England and Wales under company number 11707773, with its registered office at THE HOPTON WORKSHOP, HOPTON INDUSTRIAL ESTATE , LONDON ROAD, DEVIZES, WILTSHIRE. SN10 2EU. We are a registered data controller with the Information Commissioner's Office under number Z1967656. <https://ico.org.uk/ESDWebPages/Entry/Z1967656>

Our nominated representative for the purpose of the DPA, and DPO for the purpose of General Data Protection Regulation (GDPR) (EU) 2016/679 is Andrew Payne.

## Information we collect from you

We will collect and process the following categories of data about you:

**Information you give us.** This is information about you that you give us by filling in forms on the website, interacting with the website or by corresponding with us by phone, email or otherwise. It includes information you provide when you sign up to our newsletter service, make an enquiry about our products and services or log a support ticket.

The information you give us will include your name, address, email address and phone number, as well as preliminary information about your requirements in relation to the services which we offer.

**Information we collect about you.** This is information that we collect automatically about your visit during your time on the website. It typically involves technical information and is often collected using small data files called "cookies". This information helps us to provide you with a good experience when you browse the Site and also to indicate where the Site requires improvement.



More information on how cookies work, what cookies we use and why can be found further on in this Policy under Cookie Policy (see below).

**Information we receive from other sources.** This is information that we receive about you if you use any of the other websites we operate. In this case we will have informed you when we collected that data if we intend to share those data internally. We will also have told you for what purpose we will share your data.

This also includes information that we receive from third parties, such as business partners, sub-contractors in technical services, advertising networks, analytics providers, search information providers, and so on. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

### **Social Media platforms (Facebook, Twitter, Instagram, etc.)**

We operate social media platforms. These platforms are, in most cases, operated outside of the EU and do not comply with current Data Privacy Act and subsequent DPA/GDPR provision although they may well conform to the U.S Privacy Shield protocol.

It is our process and protocol that any personally identifiable data gathered on these platforms is only in response to users interacting out of their own volition with our marketing pages. The contact is deemed as a legitimate business enquiry. The personal contact data is removed from the site once the enquiry is processed or the user has requested so.

### **Analytics**

Our website uses Google Analytics to collect information about how visitors use our website. We anonymise this data at the point of collection and automatically delete user and event data that is older than 90 days.

### **Uses made of the information**

All information about you that we collect or receive, whether of a personal or technical nature, may be used by us in the following ways:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about other goods and services that we, or our selected partners, offer that are similar or relevant to those that you have already purchased or enquired about, such contact will only be made by email or phone from which you can opt out at any time; To notify you about changes to our services;



- To administer the Site and for internal operations, including troubleshooting, system and security updates, data analysis, testing, research, statistical and survey purposes;
- To improve the Site to ensure that content is presented in the most effective manner for you and for your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep the Site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- To comply with our record keeping and information storage obligations and policy (please see the "Where We Store Your Personal Data" section below for more details).

Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## **Disclosure of your information**

### **We may share your information with:**

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of the Site;
- Third party support services, such as, but not limited to project management tools, accounting systems and hosting data centre.



### **We will disclose your personal information to third parties:**

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- If we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our clients will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or
- To protect our rights, property or safety, or those of our clients or others.

### **Where we store your personal data**

All information that you provide to us is stored on our, or our selected business partners', secure servers, and we will take reasonable steps to protect your information in accordance with this policy, including (without limitation):

- Installing a secure firewall;
- Using anti-virus protection software;
- Encrypting data; and
- Carrying out regular back-ups.

All data sent via website forms is passed through a third party relay service and deleted after 30 days.

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 any data transmitted to the Site; and any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Your rights**

You have the following rights under law in respect of your personal information:

- The right to be informed about the collection and use of your personal information;
- The right of access to your information to verify the legality of our use of it;
- The right to request that inaccurate or incomplete information about you is rectified;
- The right to request the deletion or removal of your information where there is no further reason for us to use it (such as you have withdrawn your consent or we no longer provide your children with education);
- The right to restrict the use of your information;



- The right to obtain and reuse the information that we have about you for your own purposes;
- The right to object to certain uses (such as for marketing purposes); and
- The right not to be subject to a decision that has a legal effect on you that has been based on an automated decision.

Should you wish to exercise any of these rights, you may do so at any time by writing to us at the address given below.

If you would like to request the information we hold about you under a Data Subject Access Request ("DSAR") you can view or download an application template here - <https://web.archive.org/web/20180501062513/https://ico.org.uk/for-the-public/personal-information/> .

If you feel that your rights have been breached in any way, you should contact Andrew Payne at the address given above or lodge an official complaint with the Information Commissioner's Office via their website (<https://ico.org.uk>) or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Our web site(s) may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



## Cookie Policy

A cookie is a small file of letters and numbers that, if you agree to their use, is stored on your browser or the hard drive of your computer or device. They contain information that is transferred to your hard drive.

This website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse our website and also allows us to improve the website.

By continuing to browse the website, you are agreeing to our use of cookies as set out by this policy.

### The cookies that we could use can be split into the following categories:

**Strictly necessary cookies.** These are cookies that are required for the operation of the website. They include, for example, cookies that enable you to log into parts of the website.

**Analytical/performance cookies.** These cookies allow us to recognise and count the number of visitors to the website and to see how they move around within the website when they are using it. This helps us to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to the website, the pages you have visited and the links you have followed. We may share this information with third parties (see our Privacy Policy for more information on how we use information we collect from you).

**Fortune Cookies:** These cookies are crisp and sugary. Usually made from flour, sugar, vanilla, and sesame seed oil with a piece of paper inside, a "fortune", on which is an aphorism, or a vague prophecy.



## The cookies we use

We use the following cookies:

Category	Cookie Name	Purpose	Duration
Visitor Analytics	_ga	Used to see how our website users navigate the site. (Google)	1 year
Visitor Analytics	_gat_gtag_UA_xxxxxxx	Used to see how our website users navigate the site. (Google)	Until you close the browser
Visitor Analytics	_gid	Used to see how our website users navigate the site. (Google)	1 Day
System	PHPSESSID	A core system cookie that is used to maintain website functions such as login sessions and shopping baskets.	Until you close the browser
System	wordpress_logged_in_x	A core system cookie that is used to maintain website logins.	Until you close the browser
System	wordpress_sec_x	A core system cookie that is used to maintain website logins.	Until you close the browser
System	wordpress_test_cookie	Used by WordPress to check that cookies work	Until you close the browser
System	CookiesDirective	Used by the website to notify cookies are in use	1 year

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

### How you can block cookies

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.

However, please be aware that blocking cookies may affect your ability to use the website. In particular, you may not be able to access all or parts of the website or use the functionalities contained on it.

### Changes to our privacy policy



Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our DPO at [dpo@luxgroupholdings.com](mailto:dpo@luxgroupholdings.com), alternatively in writing to The Data Protection Officer, Lux Group Holdings Limited, Hopton Works, London Road, Devizes. SN10 2EU.