#### LANSBURY HR LTD PRIVACY POLICY

This privacy policy describes the use LansburyHR makes of information relating to users of this site. LansburyHR are data controllers under data protection law. Our address is Valley View, Mount Pleasant Road, Castle Gresley, Swadlincote, DE11 9JG. References to "you" or "your" means the user of this website. This privacy policy forms part of the company's website terms and conditions.

LansburyHR take your privacy and data very seriously. We will never ever sell or pass your data on to anyone. We'll only use it within LansburyHR to process orders and send you marketing emails, if you have opted in to receive them. No spam. You can always opt out from a link at the bottom of the emails we send or contact us to ask us. We'll do that straight away. The use of the personal data is governed by The UK Data Protection Act 2018. This means that we won't pass your information on to third parties, nor will we send you promotional material unless you agree to it. That is the law, and we stick to it.

### WHAT WE COLLECT

We collect information about you when you register with us or place an order for products or services. We also collect information when you voluntarily complete customer surveys, provide feedback, and participate in competitions. Website usage information is collected using cookies.

We may collect the following information:

- name
- contact information including email address
- demographic information such as postcode, preferences and interests
- other information relevant to customer surveys and/or offers

## WHAT WE DO WITH THE INFORMATION WE GATHER

We collect information about you to process your order, manage your account and, if you agree, to email you about other products and services we think may be of interest to you. We use your information collected from the website to personalise your repeat visits to our website. LansburyHR will not share your information for marketing purposes with external companies. In processing your order, we may send your details to, and use information from credit reference agencies and fraud prevention agencies. When someone visits www.lansburyhr.co.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

We would like to send you information about products and services of ours and other companies in our group which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes.

### WHO HAS ACCESS TO THE INFORMATION

The company may disclose personal information for the above purposes where it has a legal obligation to do so or there is a legitimate interest in processing the information. The company will share user information with its affiliates, third parties' business parties and service suppliers for the above purposes, which may include international transfers but only to countries which have equivalent data protection laws. Any transfer of personal data by the company or one of its appointed data processors shall take place only if certain conditions are complied with:

- Transfers on the basis of adequacy of data protection
- Transfers subject to the appropriate data protection safeguards through technical and organisational measures
- If binding corporate rules apply (agreements governing transfers made between organisations within a corporate group).

#### **SECURITY**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

The company endeavours to protect users' information in accordance with applicable law, but the company cannot ensure the security of any information a user transmits to the company. Users transmit such information at their own risk. Individuals affected by a breach will be notified without undue delay, if the breach poses a high risk to the rights and freedoms of the individual. Security breaches unlikely to result in a risk for the rights and freedoms of data subjects may not be reported.

## **HOW WE USE COOKIES**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### **LINKS TO OTHER WEBSITES**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### CONTROLLING YOUR PERSONAL INFORMATION

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email us at <a href="mailto:admin@lansburyhr.co.uk">admin@lansburyhr.co.uk</a>, or write to us at LansburyHR, Valley View, Mount Pleasant Road, Castle Gresley, Swadlincote, DE11 9JG. Alternative, you can fill out our Access Request Form. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. If you have previously agreed to us using your personal information for marketing purposes, you may change your mind at any time by emailing us at admin@lansburyhr.co.uk.

Under data protection law, you have the right to access the personal information that we are processing which identifies you. You are also entitled to request information which we are processing about you through automated means to be transferred to you or a third party. You are also entitled, in certain circumstances, to request that we stop processing information we hold on you, to object to any processing that we are undertaking on your information or to have the data erased.

- a. You have the right to request access to your personal data and know more specifically, why and how we hold it.
- b. You have the right to rectification of inaccurate personal data, and we will ensure that inaccurate or incomplete data is erased, amended or rectified.
- c. You have the right to have your personal data erased if:
  - i. the data is no longer needed for its original purpose and no new lawful purpose exists;
  - ii. the lawful basis for the processing is your consent, you withdraw that consent, and no other lawful ground exists;
  - iii. you exercise the right to object, and we have no overriding grounds for continuing the processing;
  - iv. the data has been processed unlawfully; or
  - v. erasure is necessary for compliance with EU law or specified British law
- d. LansburyHR have the right to decline your request for erasure of personal data to the extent that data processing is necessary:
  - i. for exercising the right of freedom of expression and information;
  - ii. for compliance with a legal obligation which requires processing by EU or British law to which LansburyHR are subject, or for the performance of a task carried out in the public interest, like public health, archiving and scientific, historical research or statistical purposes; or
  - iii. for the establishment of, exercise of or defence against legal claims.
- e. You have the right to restrict the processing of your personal data if:
  - i. the accuracy of the data is contested (and only for as long as it takes to verify that accuracy);
  - ii. the processing is unlawful, and you request restriction (as opposed to exercising the right to erasure);
  - iii. LansburyHR no longer needs the data for their original purpose, but the data is still required by LansburyHR to establish, exercise or defend legal rights; or
  - iv. verification of overriding grounds is pending in the context of an erasure request.

- f. You have the right to receive your own personal data, which you have provided to LansburyHR, in a structured, commonly used and machine-readable format. You also have the right to transmit the data to another data controller without hindrance from LansburyHR, unless this is technically unfeasible.
- g. Whenever LansburyHR justify in writing to you via privacy notice that the data processing we carry out of your personal data is on the basis of its legitimate interests, you can object to such processing. As a consequence, LansburyHR would no longer be allowed to process your personal data unless it can demonstrate compelling, legitimate grounds for the processing. These grounds must be sufficiently compelling to override your interests, rights and freedoms, such as to establish, exercise or defend against legal claims.
- h. You have the right not to be evaluated on the basis of automated processing. The right not to be subject to automated decision-making applies only if such a decision is based solely on automated processing and produces legal effects concerning you or similarly significantly affects you. The underlying processing of personal data is allowed if it is authorised by law, necessary for the preparation and execution of a contract, or done with your explicit consent, provided that LansburyHR has put sufficient safeguards in place. Such safeguards might include the right to obtain human intervention on the part of LansburyHR or another equally effective opportunity to express your point of view to contest the decision.

Should you wish to exercise any of your rights under data protection law, please email <a href="mailto:admin@lansburyhr.co.uk">admin@lansburyhr.co.uk</a>.

If you have any issues about the way in which the company is using your information, please email <a href="mailto:admin@lansburyhr.co.uk">admin@lansburyhr.co.uk</a> who will be able to consider the matter for you. Should you be dissatisfied with the company's response, you have the right to raise your concerns with the Information Commissioner's Office.

# APPLICABLE LAW

This site is created and controlled by the company and subject to the laws of England & Wales and subject to the jurisdiction of the English court. The company reserves the right to make changes to the site and this privacy statement from time to time. By using the site or supplying information to us, you are agreeing and consenting to the use of information relating to you (<u>including international transfer</u>) as described in this privacy statement.

# **CHANGES TO OUR PRIVACY POLICY**

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on 12.05.22.

## **HOW TO CONTACT US**

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at <a href="mailto:admin@lansburyhr.co.uk">admin@lansburyhr.co.uk</a> or write to us at LansburyHR, Valley View, Mount Pleasant Road, Castle Gresley, Swadlincote, DE11 9JG.