# **Lucidity Innovation Ltd Privacy Policy**

This Privacy Policy describes the policies of Lucidity Innovation Ltd, and explains the information we collect about you on our website/s and the steps we take to ensure your information is kept secure and confidential.

We do not knowingly collect or store personal information about children under the age of 16. If you are aged under 16, please get your parent or guardians permission before you provide any personal information to us.

By accessing or using our website, you are consenting to the collection, use and disclosure of your information in accordance with this Privacy Policy. If you do not consent to the same, please do not access or use lucidity.org.uk.

We may modify this Privacy Policy at any time without any prior notice to you and will post the revised Privacy Policy on lucidity.org.uk. The revised Policy will be effective 180 days from when the revised Policy is posted on lucidity.org.uk and your continued access or use of lucidity.org.uk after such time will constitute your acceptance of the revised Privacy Policy. We therefore recommend that you periodically review this page.

#### Information we collect

We may collect and process the following personal information about you:

Name, email, address, work address, payment information.

### How we collect your information

We collect/receive information about you in the following manner:

- When you complete a registration form or otherwise submit personal information
- When you interact with lucidity.org.uk
- From public sources

## Your email address

We collect your email address when you register to receive email updates and hold it in our email service provider – Kit. If you wish to stop receiving our email you can do so at any time by clicking the unsubscribe link in the footer of every email.

We also collect your email address when you join the membership community the Lucidity Network, Lucidity Leadership Programme or purchase training products. We use this to send you details of your membership subscription and links to purchased training products. You can unsubscribe at any time from within the Lucidity Network platform, by clicking the unsubscribe link in the footer of the email or by emailing hello@lucidity.org.uk.

### Your IP address

We collect your IP address via Google Analytics when you visit lucidity.org.uk to generate aggregate, anonymised data, for example pages visits, how long you spent on the site, the website that referred you and location provided by your IP address for internal reporting in order to improve our site and the services we offer.



#### How we use the information we collect

We may use the information that we collect about you for the following purposes:

- Marketing and promotional, targeted advertising and testimonials.
- Creating and managing user accounts (for Lucidity Network), collecting feedback from customers, managing customer orders and processing payments.
- To enforce terms and conditions, site protection, dispute resolution.
- Administration information and support.

If we want to use your information for any other purpose, we will ask you for consent and will use your information only on receiving your consent and then, only for the purpose(s) for which grant consent unless we are required to do otherwise by law.

# How we share your information

We will not transfer your personal information to any third party without seeking your consent, except in limited circumstances as described below:

### **Analytics**

We require such third party's to use the personal information we transfer to them only for the purpose for which it was transferred and not to retain it for longer than is required for fulfilling the said purpose.

We may also disclose your personal information for the following:

- (1) to comply with applicable law, regulation, court order or other legal process;
- (2) to enforce your agreements with us, including this Privacy Policy;
- (3) to respond to claims that your use of lucidity.org.uk violates any third-party rights.

If lucidity.org.uk or our company is merged or acquired with another company, your information will be one of the assets that is transferred to the new owner.

### **Retention of your information**

We will retain your personal information with us for 90 days to 2 years after users terminate their accounts or for as long as we need it to fulfil the purposes for which it was collected as detailed in this Privacy Policy. We may need to retain certain information for longer periods such as record-keeping / reporting in accordance with applicable law or for other legitimate reasons like enforcement of legal rights, fraud prevention, etc. Residual anonymous information and aggregate information, neither of which identifies you (directly or indirectly), may be stored indefinitely.

### **Your rights**

Depending on the law that applies, you may have a right to access and rectify or erase your personal data or receive a copy of your personal data, restrict or object to the active processing of your data, ask us to share (port) your personal information to another entity, withdraw any consent you provided to us to process your data, a right to lodge a complaint with a statutory authority and such other rights as may be relevant under applicable laws.

To exercise these rights, you can write to us at hello@lucidity.org.uk. We will respond to your request in accordance with applicable law.



You may opt-out of direct marketing communications or the profiling we carry out for marketing purposes by writing to us at hello@lucidity.org.uk.

Do note that if you do not allow us to collect or process the required personal information or withdraw the consent to process the same for the required purposes, you may not be able to access or use the services for which your information was sought.

### Cookies

To learn more about how we use these and your choices in relation to these tracking technologies, please refer to our Cookie Policy.

### Security

The security of your information is important to us and we will use reasonable security measures to prevent the loss, misuse or unauthorized alteration of your information under our control. However, given the inherent risks, we cannot guarantee absolute security and consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk.

# Third party links and use of your information

Lucidity.org.uk may contain links to other websites that are not operated by us. This Privacy Policy does not address the privacy policy and other practices of any third parties, including any third party operating any website or service that may be accessible via a link on lucidity.org.uk. We strongly advise you to review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

### **Grievance / Data Protection Officer:**

If you have any queries or concerns about the processing of your information that is available with us, you may contact our Data Protection Officer Lucy Gower at Lucidity Innovation Ltd, Burn View, Bude, email: lucy@lucidity.org.uk. We will address your concerns in accordance with applicable law.

If you feel that your data has been handled incorrectly, or you are unhappy with the way we have dealt with your query regarding the way we use your personal data, you have the right to complain to the Information Commissioner's Office (ICO) which regulates the use of information in the UK.

You can call them on 0303 123 1113 or go online to www.ico.org.uk/concerns If you are based outside the UK you have the right to complain to the relevant data protection supervisory authority in your country.

Burn View, Bude, Cornwall EX23 8BX, United Kingdom email: lucy@lucidity.org.uk phone: + 44 7919 173 042

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