

Policy date: 1st June 2024 Author: Adam Lowing

Review date: 1st June 2025

LB Integrity ("We") are committed to protecting and respecting your privacy, in accordance with General Data Protection Regulation. We commit to:

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held
- provide training and support to staff who handle personal data, so that they can act confidently and consistently
- register our details with the Information Commissioner's Office (ICO)

This policy 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.

For the purpose of the Data Protection Act 2018 (the Act), the data controller is LB Integrity of 35 Regent Way, Kings Hill, Kent, ME19 4EB (registration number 13976539).

#### Information we may collect from you

We may collect and process the following data about you:

- If you contact us, we may keep a record of that correspondence.
- Details of your visits to our site, including, but not limited to, traffic data, location data, operating system, browser usage and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

### **Data Protection Principles**

There are six data protection principles that are core to the General Data Protection Regulation. We will make every possible effort to comply with these principles at all times in our information-handling practices. The principles are:

- Lawful, fair and transparent Data collection must be fair, for a legal purpose and we
  must be open and transparent as to how the data will be used
- Limited for its purpose Data can only be collected for a specific purpose
- Data minimisation Any data collected must be necessary and not excessive for its purpose
- Accurate The data we hold must be accurate and kept up to date
- Retention We cannot store data longer than necessary
- Integrity and confidentiality The data we hold must be kept safe and secure

Key risks - The main risks are in two areas;

- information about individuals getting into the wrong hands, through poor security or inappropriate disclosure of information
- individuals being harmed through data being inaccurate or insufficient

## Responsibilities

LB Integrity is the data controller for all personal data held by us and is responsible for:

- Analysing and documenting the types of personal data we hold
- Checking procedures to ensure they cover all the rights of the individual
- Identifying the lawful basis for processing data
- Ensuring consent procedures are lawful
- Implementing and reviewing procedures to detect, report and investigate personal data breaches
- Storing data in safe and secure ways
- Assessing the risk that could be posed to individual rights and freedoms should data be compromised.

### IP addresses and cookies

We may collect information about your computer, including where available your IP address, 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 and we will not collect personal information in this way.

### Data recording, security and storage

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it is obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this. We will retain personal data for no longer than is necessary.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. 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 data transmitted to our site; any 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.

In cases when data is stored on printed paper, it will be kept in a secure place where unauthorised personnel cannot access it. Printed data will be shredded when it is no longer needed.

Data stored on CDs, memory sticks or portable hard drives will be encrypted or password protected and locked away securely when they are not being used. Cloud services used to

store personal data will be assessed for compliance with GDPR Principles. Data will be regularly backed up. All servers containing sensitive data must be protected by security software. All possible technical measures will be put in place to keep data secure.

### **Accountability and Transparency**

We will ensure accountability and transparency in all our use of personal data. We will keep written up-to-date records of all the data processing activities we do and ensure that they comply with each of the GDPR principles.

We will regularly review our data processing activities, and implement measures to ensure privacy by design, including minimisation, transparency and continuously improving security and enhanced privacy procedures.

#### Uses made of the information

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.

We may also use your data to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

## Disclosure of your information

We may disclose your personal information to third parties:

 If we are under a duty to disclose or share your personal data in order to comply with any legal obligation to our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Consent and your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. You can exercise the right at any time by contacting us at <a href="mailto:admin@lbintegrity.co.uk">admin@lbintegrity.co.uk</a> or at LB Integrity, 35 Regent Way, Kings Hill, ME19 4EB.

We will comply with both data protection law and Privacy and Electronic Communications Regulations (PECR) when sending electronic marketing messages. PECR restricts the circumstances in which we can market people and other organisations by phone, text, email or other electronic means

## **Subject Access Requests**

An individual has the right to receive confirmation that their data is being processed, access to their personal data and supplementary information which means the information which should be provided in a privacy notice. We will provide an individual with a copy of the information requested within one month of receipt of the request. We will provide the data in a structured, commonly used and machine-readable format. This would normally be a PDF file, although other formats are acceptable. We must provide this data either to the individual who has requested it, or to the data controller they have requested it be sent to. Once a subject access request has been made, we will not change or amend any of the data that has been requested.

Any subject access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. If complying with the request is complex or

numerous, the deadline can be extended by two months, but the individual will be informed within one month.

We can refuse to respond to certain requests, and can, in circumstances of the request being manifestly unfounded or excessive, charge an additional fee. If the request is for a large quantity of data, we can request the individual specify the information they are requesting.

# Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. However, we advise that you check this page regularly to keep up to date with any necessary changes.

#### Contact

Questions, comments and subject access requests regarding this privacy policy are welcomed and should be addressed to <a href="mailto:admin@lbintegrity.co.uk">admin@lbintegrity.co.uk</a> or at LB Integrity, 35 Regent Way, Kings Hill, ME19 4EB.