

## **Lucoro Limited - Privacy Policy**

### **Overview**

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area. It also addresses the export of personal data outside the EU and EEA. The GDPR aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.

GDPR regulates the processing of information relating to you and grants you various rights in relation to your personal data.

Lucoro Limited is committed to ensuring that your privacy is protected and that we comply with the obligations of GDPR.

This Privacy Policy explains how we will treat any personal information that you provide us, details your rights and how you can access them and provides assurances on things we will not do.

We do not use Cookies on our web site.

### **The information we collect and how we use it**

We may collect information about you and your organisation such as company name, address, job title, e-mail address and phone number.

We gather this information to allow us to process your registration and efficiently administer transactions and deliveries, as well as using it to develop and improve our services.

We will only send marketing material or advertise the products and services of the company by email, text or phone call to those whose contact details the company has obtained during a transaction. All subscribers can opt out of such communications.

## **What information is being collected?**

Order related data, to process your order efficiently we need information about you and your organisation such as company name, address, the nature of your business, e-mail address and phone number.

## **Purposes of Data Processing**

Data Processing is limited to the following:

Using customers name and address to complete business transactions including invoicing, credit checking, drop shipment or other order or contract related obligations.

## **Categories of Personal Data**

Processing of personal data is limited to customer, supplier data and employee personal data.

We do not hold or process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership and we comply with the restrictions regarding the processing of genetic data, biometric data for uniquely identifying a natural person and data concerning health or person's sex life or sexual orientation.

We do not hold or process personal data relating to criminal convictions and offences or related security measures.

## **Lawful Basis for Processing Personal Data**

All processing of personal data is lawful and fair. We ensure transparency with customers, suppliers and employees regarding how personal data concerning them is collected, used, or otherwise processed and to what extent the personal data will be processed.

We ensure all information and communication relating to the processing of personal data is easily accessible, easy to understand, and delivered with clear and plain language.

The lawful basis clauses applicable to personal data we hold, or process are limited to:

- Consent - You have given clear consent to process personal data for a specific purpose.
- Contract - The processing is necessary for a contract with you or because you have asked us to take specific steps before entering into a contract.

**Legal obligation - The processing is necessary to comply with the law**

Legitimate Interests - The processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests, ie. consent is withdrawn.

The following table details data or data processing activities, the group of persons whose data is used and the lawful basis we apply.

<b>Type of Data or Use</b>	<b>Customer Group</b>	<b>Lawful Basis</b>
Product discounts or promotions	Qualified Business Customers	Legitimate Interest
E-mail of above	Qualified Business Customers	Legitimate Interest
Transaction Records	All Customers	Legal Obligation
Credit Check	All Customers	Contract
Customer Delivery Data	All Customers	Contract
Supplier Data	All Customers	Contract

We limit personal data collected to what is necessary for the purposes for which they are processed. Personal data is held to ensure contractual obligations are met or to meet legal requirements for the keeping of records.

We apply personal data retention rules and annually review them in a specific GDPR audit process.

Every reasonable step is taken to ensure that personal data that is inaccurate is rectified or deleted. Personal data is processed in a manner that ensures appropriate security and confidentiality of the personal data, including preventing unauthorised access to or use of personal data and the equipment used for the processing.

## Legitimate Interest Assessment

Lucoro Limited consider that business customers with past or ongoing contracts with specific criteria achieved can be defined as legitimate interests.

We ensure legitimate interests are the most appropriate basis though a Purpose Test. We check that the processing is necessary through a Necessity Test and complete a Balancing Test to be confident that an individual's potential interests do not override those legitimate interests.

## Data processing by third parties

We will share your data with our relevant partners to ensure your transaction can be completed effectively. The table below details the type of partner and reason for processing.

Activity	Nature of the data use
Couriers	We use third party couriers to deliver your order
Direct Shipment	We may order products to be sent directly from a manufacturer to you; this requires delivery information to be sent to the manufacturer to complete the transaction.
Payment Providers	We partner with a limited number of payment providers to provide you with a range of ways to pay.
Credit Reference Service	We may use a credit reference agency to determine your suitability for credit terms if you apply and give consent.
Credit Recovery Services	Failure to pay in an agreed period may result in your details being passed to a credit recovery agent.
Email processing	Our email server provider will process all emails that come to or leave us.
Mail Filtering	Internal and external emails are passed through a filter by a service provider for protection against malware and for PCI compliance.
Web Services	We use payment providers, postcode lookup and SMS services.

## **Your Rights - Right to be informed**

This Privacy Statement sets out clear principles of when, how and why we collect data. At the point of personal data collection, we explicitly detail the personal data required and how it will be used. If we change how data is being processed or unrestricted the use of personal data, we will communicate this change.

The right to object will be clearly communicated separately to the privacy statement on all electronic customer communications.

We do not hold or process children's personal data.

## **Your Rights - Right of access**

You have the right to request personal information held and details regarding how it is being processed and who by.

On request in writing by letter or email, we provide free information regarding personal data held within 28 days of the request if successful verification of identity has been completed.

The information we provide will be in electronic format, contain the personal data we hold, when and how it was obtained and our statement of intent.

## **Your Rights - Right to rectification and data quality**

On request in writing by letter or email, we will update or improve the data we hold within 28 days of the request if successful verification of identity has been completed.

Personal data is reviewed periodically to check the quality of information improve the quality through planned activities.

## **Your Rights - Right to erasure including retention and disposal**

- Individuals have the right to be forgotten and can request the erasure of personal data if:
- it is no longer necessary for the purpose originally collected.
- if the individual withdraws consent for processing the data.
- when we are relying on legitimate interests as the basis for processing.
- if the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing.
- when processing personal data for direct marketing purposes and the individual objects to the processing.
- if personal data must be erased to comply with a legal obligation.

On request either writing by letter or email, we will review the request and respond within 28 days of the request if successful verification of identity has been complete.

Personal data is stored as per the personal data retention and deletion policy.

## **Your Rights - Right to restrict processing**

Individuals have a right to block or restrict the processing of their personal data.

On request either writing by letter or email, we will block or restrict the processing of personal data within 28 days of the request if successful verification of identity has been completed.

If necessary, we will continue to hold the personal data but restrict further processing.

## **Your Rights - Right to data portability**

Individuals have the right to request their personal data to move it to another provider.

On request either writing by letter or email, we provide free information regarding personal data held within 28 days of the request if successful verification of identity has been completed.

## **Your Rights - Right to object**

Individuals have a right to object to the processing of their personal data. All policies and procedures will be reviewed to resolve the objection and act.

On request either writing by letter or email, we will reply to an objection regarding the processing of personal data within 28 days of the request if successful verification of identity has been complete.

Individuals have an absolute right to object to any processing undertaken for the purposes of direct marketing and all processing for this purpose will stop immediately.

## **Your Rights - Rights related to automated decision making including profiling**

We understand an individual's rights and do not make decisions regarding individuals through automated decision making.

## **Recommendations of other companies and links to other websites**

This privacy policy covers the activity and operations of Lucoro Limited only. Lucoro Limited accepts no responsibility or liability for the third-parties and third-party websites we may recommend or provide links to. We advise that visitors should consult the respective privacy policies of these companies and/or websites.

## **Unsubscribing from emails, texts or phone calls**

Customers who wish to stop receiving our communications can do so quickly and easily. Requests can be submitted to [enquiries@lucoro.co.uk](mailto:enquiries@lucoro.co.uk).

## **Payment card information**

Lucoro Limited may from time-to-time offer third party card payment solutions. These will conform to PCI (Payment Card Industry) Legislation regarding the protection of cardholder's data and personal information. All transactions take place within a secure area of the payment company's website. Personal payment card information is not published in any form on the website and is not accessible to staff of Lucoro Limited.

## **Changes to this privacy policy**

This privacy policy is reviewed annually and was last updated on 24 May 2018.

## **How to contact us**

If you have any concerns or queries relating to your personal information or any aspect of our privacy policy, please e-mail [enquiries@lucoro.co.uk](mailto:enquiries@lucoro.co.uk) or write to us at:

Lucoro Limited  
Clay Pit Lane  
Bar Lane Industrial Estate  
Roecliffe  
YO51 9FS

## **Regulatory Authority**

You have the right to appeal to the regulatory authority, the Information Commissioner's Office (the UK's independent authority set up to uphold information rights in the public interest, and promote openness by public bodies and data privacy for individuals).