



## Logically Secure Privacy Policy

*Last updated January 2024*

Welcome to Logically Secure's privacy policy.

Logically Secure respects your privacy and is committed to protecting your personal data. This privacy policy explains how we look after your personal data when you visit our website or when you engage with us to use the products or services that Logically Secure provides. This privacy policy also tells you about your privacy rights and how the law protects you.

### 1. Important information and who we are

#### Purpose of this privacy policy

This privacy policy aims to give you information on how Logically Secure collects and processes personal data belonging to you or your personnel in the context of providing our services to you or your business, through your use of our website and through any of the other ways we interact.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or policy (or fair processing notice or policy) we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and policies and is not intended to override them.

#### Controller

Logically Secure Limited is the company responsible for processing your data, i.e. the data controller, and is the entity responsible for the Logically Secure website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

#### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Logically Secure Limited

ICO Registration No: C1440834

Email address: [privacy@logicallysecure.com](mailto:privacy@logicallysecure.com)

Postal address: Logically Secure Limited, 167-169 Great Portland Street, 5<sup>th</sup> Floor, London W1W 5PF, United Kingdom.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first

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instance.

## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 18 January 2024. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** which includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** which includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** which includes bank account and payment card details.
- **Transaction Data** which includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** which includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data** which includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** which includes information about how you use our website, products and services.
- **Marketing and Communications Data** which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which

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will be used in accordance with this privacy policy.

In certain circumstances, our collection of the different categories of data set out above may include the collection of **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We also may collect Criminal Convictions and Offences Data in certain circumstances.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of our engagement with you, and you fail to provide that data when requested, we may not be able to perform the services set out in our engagement letter with you.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including:

- In the process of carrying out work for you (or your business) where we will in almost all instances act as a controller. In very limited circumstances we may act as a processor in which case we will let you know and ensure that an appropriate contract is put in place.
- When we communicate with you by email or other electronic correspondence, by telephone or using video conferencing software. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - make a request for our services;
  - create an account on our website;
  - subscribe to our publications;
  - request marketing to be sent to you;
  - complete a survey; or
  - provide us with feedback.
- Networking (for example, at in-person or virtual events).
- By virtue of our access to CCTV footage.
- Otherwise through providing our services and operating our business.

We also collect data from and about you via our website:

- Through your actions (for example, when submitting a subscription form or when submitting a job application).
- Through automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our

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cookies.

- Through third parties or publicly available sources. We will receive personal data about you from various third parties.
- Technical Data from analytics providers such as Google which may be based outside the UK, advertising networks which may be based outside of the UK or search information providers which may be based outside of the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services which may be based outside of the UK.
- Identity and Contact Data from data brokers or aggregators which may be based outside of the UK.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

#### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests – these legitimate interests include our interests in managing our relationship with our clients, prospective clients and their staff, hosting clients and others at our offices, hosting virtual and in-person events and ensuring appropriate standards and compliance with policies, practices or procedures;
- where we need to comply with a legal obligation; or
- where our services require us to process "special category data" and where we have obtained your explicit consent to do so. If we seek and obtain your consent, you may withdraw it at any time.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and carry out all of our regulatory or compliance requirements including conflict of interest, anti-money laundering, fraud and background screening.	(a) Identity (b) Contact (c) Financial (d) Professional	(a) Performance of a contract with you  (b) Necessary to comply with a legal or regulatory obligation  (c) Necessary for our legitimate interests (to detect and prevent the commission of fraud or money laundering)
To process, perform and fulfil services including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us  (c) Engaging service providers	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to provide the very best client service or recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

	Communications	
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To complete business administration tasks and	(a) Identity	Where we use your personal data in connection with a business



achieve legal compliance	(b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	transition, to enforce our legal rights or to protect the rights of third parties it is in our or our third party's legitimate interest to do so. For all other purposes in this section, it is our legal obligation to use your personal data to comply with any legal obligations imposed upon us.
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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please refer to our cookies policy.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the



legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share personal information with a variety of the following categories of third parties as necessary:

- our professional advisers such as lawyers and accountants;
- government or regulatory authorities;
- professional indemnity or other relevant insurers;
- regulators/tax authorities/corporate registries;
- third parties to whom we outsource certain services such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers;
- third parties engaged in the course of the services we provide to clients such as relevant experts;
- third party service providers to assist us with client insight analytics, such as Google Analytics;
- third party postal or courier providers who assist us in delivering documents related to a matter;
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties to provide our services as effectively as we can.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

In order to provide our services to you, we may need to transfer your personal information to locations outside the jurisdiction in which you provide it. Some of our external third parties are based outside the UK so their processing of your personal data will also involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- transferring your personal data to countries that have been deemed to provide an adequate

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level of protection for personal data;

- implementing a suitable data transfer agreement or alternative such as EU standard contractual clauses; or
- where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you may have rights under data protection laws in relation to your personal data, as follows:

- **Your right of access:** If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details).

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- **Your right to rectification:** If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to erasure:** You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to restrict processing:** You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information, or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to data portability:** You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Your right to object:** You can ask us to stop processing your personal information, and we will do so, if we are:
  - relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
  - processing your personal information for direct marketing purposes.
- **Your right to withdraw consent:** If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- **Your right to lodge a complaint with the supervisory authority:** If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant Supervisory Authority.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### What we may need from you



We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.