

Lucidity Privacy Statement

1. 1. Introduction

Lucidity Innovation Ltd is committed to protecting the privacy and security of personal data and operates in accordance with the GDPR (General Data Protection Regulation).

This Privacy Statement explains the types of personal data we may collect about you when you interact with us. It also explains how we store and handle that data and keep it safe.

“Personal data” is information relating to you as a living, identifiable individual.

“Processing” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

The law states that we:

- Process your data in a lawful, fair and transparent way
- Only collect your data for explicit and legitimate purposes
- Only collect data that is relevant, and limited to the purpose(s) we have told you about
- Ensure that your data is accurate and up to date
- Ensure that your data is only kept as long as necessary for the purpose(s) we have told you about
- Ensure that appropriate security measures are used to protect your data.

The following sections will answer any questions you have, but if not, please get in touch. Contact details are shown at the end of this statement.

It is likely that we will need to update this Privacy Statement from time to time, and you are welcome to come back and check this at any time or contact us by any of the means shown below.

1. 2. What is Lucidity?

Lucidity provides training, coaching and consultancy to individuals and organisations to help them to think clearly and get better results. Lucidity also manages a membership club called the Lucidity Network. Lucidity Innovation is registered at Companies House registration number 08306104.

1. 3. Explaining the legal bases we rely on

The law on data protection together with the GDPR set out a number of different

reasons or conditions for which an organisation may collect and process your personal data. When collecting your personal data, we will always make clear to you which data is necessary for each purpose or type of data. Most commonly, we will process your data on the following lawful grounds:

Consent

In specific situations, we can collect and process your data with your consent.

This may include when you agree to receive Lucidity Insights – a monthly-ish email with information and insight on clearer thinking and better results, or specific information about training courses, events you might be interested in or the Lucidity Network membership. When you make an enquiry we may collect your implied consent to enable us to send information you have requested. For example, when you want to attend a ‘networking event’ session or to see whether you want to join the Lucidity Network.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, to process the insurance against personal injury.

Legal compliance

If the law requires it, we may need to collect and process your data.

This will include sharing with law enforcement agencies details of people involved in fraud or other criminal activity associated with Lucidity Innovation Ltd.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected when we pursue our aims and objectives as an organisation and which does not materially impact your rights, freedom or interests.

Lucidity Innovation Ltd has a legitimate interest in maintaining a record of its activities, for example storing some data about Lucidity Network members and the events they have attended.

We may also use your data, typically in an emergency, where this is necessary to protect your **vital interests**, or someone else’s vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

Special category data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need clear justification for collecting, storing and using this type of personal data. We aim to collect and process special category data as little as possible. Lucidity Innovation Ltd will document all incidents of its processing of special category data in its Information Asset Register, and will be preparing a separate document itemising all of these, with reasons, having conducted assessment on each occasion.

The Special Categories of personal data consist of data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership.

They also consist of the processing of:

- genetic data
- biometric data (e.g. fingerprints) for the purpose of uniquely identifying someone
- data concerning health
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, and further conditions are met
- Where there is a legal obligation.

Mostly however, we only process health information to safeguard members and to uphold our duty of care to those that work with us.

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for "special categories" referred to above.

1. 4. When we collect your personal data:

These occasions will include, but are not limited to:

- When you are a Lucidity Network member
- When you attend a networking session or training event
- If you are injured during training or an event

- If requested by a lawful authority such as the Police
- When you access or engage with our website
- When you request to receive Lucidity Insights or other free resources.

1. 5. How and why we collect your personal data

Lucidity Innovation Ltd collects personal data in order to manage client relationships, Lucidity Network membership, arrange events and deal with enquires. The data collection could be in electronic or paper format.

When you visit the Lucidity website, we may collect your IP Address, page visited, web browser, any search criteria entered, previous web page visited and other technical information. This information is used solely for web server monitoring and to deliver the best visitor experience. We may use technology such as cookies to help us deliver relevant and interesting content in our communications in the future.

We use the following cookies:

Strictly necessary cookies These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site, and access our services.

Analytical/performance cookies They allow us to recognise and count the number of visitors, and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily.

We may profile you to find out more about you but in the least most intrusive way. We may use information we collect to display the most interesting content to you on our website and we may use data we hold about your previous visits.

We may also collect your social media username if you interact with us through those channels in order to help us respond to your comments, questions and feedback. The data privacy law allows this as part of our legitimate interest in understanding our audience.

For your security, we use all appropriate organisational and technical security controls to safeguard your data.

When we interact with you we may also collect notes from our conversations with you, and details of any complaints or comments you make. We may record your age or identity where the law requires this.

We will only ask for and use your personal data collected for the purpose stated at the point at which it is collected. If we believe your data is no longer needed for this purpose we will not process your data further.

1. 6. What are your rights over your personal data?

You have the right of access to the personal information we may hold about you. This is free of charge and will be supplied to you within one month of your request.

If you have given consent for Lucidity Innovation Ltd to collect and process your personal data, you have the right to change your mind at any time and to withdraw that consent.

You have the right to challenge automated decisions we make about you. You may ask for these to be assessed by contacting us on the contact details listed below.

You have the right to request a copy of any information about you that Lucidity Innovation Ltd may hold at any time to check whether it is accurate. To ask for that information, please contact Lucidity Innovation Ltd.

To protect the confidentiality of your information and the interests of Lucidity Innovation Ltd, we will ask you to verify your identity before proceeding with any request for information. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to request such information.

We may send you relevant and personalised communications by post. We will do this on the basis of our legitimate interest but only after certain risk assessments have been undertaken. You are free to opt out of hearing from us by any channels at any time.

Sometimes we are required to inform you about certain changes, including updates to this Privacy Statement and where we have a legal obligation such as a duty of care or safeguarding. These administrative messages will not include any marketing content and do not require prior consent when sent by email. This ensures that we are compliant with our legal obligations.

We may use your data to send you a survey and feedback requests to help improve the way we communicate. These messages will not include any marketing and do not require prior consent when sent by email. We have a legitimate interest to do so as this helps improve our services and make them more relevant to you. Of course, you are free to opt out of receiving any of these communications.

1. 7. Data retention

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected. The Information Asset Register includes retention periods and this Register will indicate the types of data which are processed and for how long. At the end of the retention period, your data will either be deleted completely, put beyond use or anonymised.

1. 8. Protecting your data outside the EEA

Occasionally we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA). The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA, such as the USA. For this we rely on EU-US Privacy Shield or EU Model Clauses as applicable. For example, this might be required when we store data in a Cloud Service. If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA, and we will treat the information under the guiding principles of this Privacy Notice.

1. 9. Stopping us from using your data in the future

You can stop communications from Lucidity Innovation Ltd by either:

- clicking the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails and will 'forget' your information in line with your rights unless we have a legal obligation to keep it;
- or by contacting us using the information below.

Remember, some administrative communications for current members cannot be stopped.

1. 10. How to complain about our processing of your data

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](tel:03031231113) 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.

If you would like to discuss any aspect of this policy or the way Lucidity Innovation Ltd processes your information please contact;

The Data Controller;

By post at Lucidity Innovation Ltd, 21 Newnham Road, London, N22 5SS

By email at lucy@lucidity.org.uk

By telephone +44 9719 173 042