



GDPR and Privacy Policy ("Privacy Policy")

Legal Information

- The ICO registration for **Love Code Less Ltd.** ("LCL") is ZB810522
- Love Code Less is a limited liability company registered in England & Wales under company number **15965415** with a registered office is at 9 Granville Road, Epping, Essex, CM16 6SR, United Kingdom.
- Further information regarding **Love Code Less Ltd.** can be found by visiting www.lovecodeless.com.

Introduction

At LCL, we care about safeguarding the personal data of all stakeholders, our valued customers, employees, and trusted partners and suppliers. We are committed to compliance with all relevant laws and regulations and will only use personal data for lawful business purposes. We strive to ensure that the data we collect is accurate, complete, and up-to-date, and that it is kept safe from unauthorised access, loss or damage. Data protection is at the core of our values, and we believe everyone has a right to privacy.

Relevant Legislation

LCL must look after your personal information by law. The main legislation that applies to protecting your information is:

- General Data Protection Regulations (UK) (GDPR UK)
- Data Protection Act 2018 (DPA)
- Human Rights Act 1998 (Article 8) (HRA)
- Privacy and Electronic Communications Regulations 2003 & 2011 (PECR)
- Money Laundering Regulations 2017
- Proceeds of Crime Act 2002
- The Data Protection, Privacy and Electronic Communications (Amendments etc.)(EU Exit) Regs 2019
- Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000
- Regulation of Investigatory Powers Act 2000 (RIPA)



Information covered by this Privacy Policy

This Privacy Policy covers use of personal information as defined in GDPR UK and the DPA.

"Personal data". This is information, or any combination of separate pieces of information, that could be used to identify you. This includes your name, address, contact details etc.

"Special category" personal data. This sensitive personal information is given more protection in law. For example, details of your health or nationality.

The Information We Collect

When you enquire or register for products and services provided by LCL we may collect personal information from a variety of sources. Most of the personal information we collect will have been provided by you during your relationship with us either through face-to-face contact, by telephone, email or electronic communication such as messaging, on-line forms or emails.

However, we may also obtain your personal data from other sources including:

- information we collect when you visit our websites
- companies which support advertising services that promote our, social media and networking sites (such as LinkedIn, Instagram, Facebook and X (formerly known as Twitter)) and online advertising platforms.
- information provided to us by other third parties.
- other publicly available sources.

We collect your personal information based on the service or services we are offering you. We will only collect the information needed. We will not sell your personal information to anyone. Some examples of information we collect, hold and process are: Name, Job Title, Company details, Email address, Phone Number/s, Phone call notes, Email dialogue.

Information Obtained From Third Parties

Where we are required by law, or for legitimate business needs, we will obtain information about you from third parties, but only after we have your consent to do so. For example, the third parties we may need to contact include: credit reference agencies, employers, solicitors, etc. to obtain references, verify your identity.

How We Use Your Information

We will process the information you provide or we obtain from other sources to provide you with products and services and answer any questions you may have and hold such information under "legitimate interest".



Any request to view data stored or remove data will be actioned within a reasonable timeframe; we aim for 2 working days. Please note, if you request data to be removed, if you are on Business Social Media, or quoted in Business press for example, we will have no record of you wishing not to be contacted and you may be re-contacted in such a case.

Who we share your information with

We may share information within the LCL Group to provide you with an agreed product or service. We do not share or further process your data, other than to keep you informed of relevant content relating to LCL activities.

Legal Basis for Processing your Information

We have set out below the ways we may use your personal data, and which of the legal bases we rely on to do so, and our legitimate interests 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 around this:

Activity	Information	Legitimate Interest
Relationship management, including: (i) Notifying you about changes to our terms or privacy notice (ii) Asking you to take a survey	(i) Identity (ii) Contact (iii) Marketing and Communications	(i) Requirement to comply with a legal obligation (ii) Requirement for our legitimate interests (to keep our records updated and to study how customers use LCL products/ services)
The administration and protection of LCL's business and its website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(i) Identity (ii) Contact (iii) Technical	(i) Requirement for our legitimate interests (running our business, provision of administration and IT services, network security, fraud prevention and in the context of a business reorganisation or group restructuring exercise) (ii) Requirement to comply with a legal obligation

To deliver relevant content to you	(i) Identity (ii) Contact (iii) Usage (iv) Marketing and Communications (v) Technical	Requirement for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our prospecting/ marketing strategy)
To use data analytics to improve our products/services, marketing/ prospecting, website, customer relationships and experiences	(i) Usage (ii) Technical	Requirement for our legitimate interests (to determine customer categories for our products and services, to keep our website relevant and up-to-date, to grow our business and to develop our prospecting/ marketing strategy)
To present recommendations to you about products or services that may be of interest to you	(i) Identity (ii) Contact (iii) Technical (iv) Usage (v) Marketing and Communications	Requirement for our legitimate interests (to develop our products/ services and grow our business)

Your statutory rights

You have several rights concerning the personal information we process about you. You have the right to request the following:

- *for access to a copy* of your personal information we hold about you. This is called a data subject access request. We may ask you to provide ID to verify your identity.
- *to correct* your personal information if it is inaccurate. We may ask you to provide confirmation to ensure the information we hold is accurate.
- *to delete* your personal information. We are unable to delete your information if the law requires us to keep it for a statutory period or there is a lawful reason we must keep the information. We will always investigate any request and advise you, if we are unable to erase your data.
- *to transfer* your data if your information is processed by automated means.



- *withdraw your consent* to use your personal information. Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by simply contacting the branch or team you have been speaking to.
- *to restrict the use* of your personal data, including direct marketing.
- *object to* our use of your personal data for our legitimate business interests. You have an absolute right to object to our use of your data for direct marketing.
- *object to an automated decision*.

Your right of access (known as a Subject Access Request)

If you wish to make a request for access to a copy of your personal data (i.e. information we hold specifically about you), or to exercise any of your other rights, please write to us. You will need to provide sufficient details to be able to locate the information you need. We will also need to verify your identity.

Exemptions within the legislation could mean that you may not receive all the information we process. If this is applicable an explanation will be provided to you within our response.

Information relating to a service complaint will not be within the scope of a Subject Access Request. Our Customer Service team can be contacted by emailing diep@lovecodeless.com and they will be better placed to help resolve your problem quickly.

How We Protect Your Information

We store your personal information on our electronic computer systems and in possibly in our paper filing systems. In accordance with the law we have strict security procedures to ensure that personal information is not damaged, destroyed or misused, and to prevent unauthorised access to your information. We have an internal breach reporting system to record all information security incidents and breaches. Serious data breaches are reported to the ICO within 72 hours, in accordance with the GDPR UK and the DPA.

Data Transfers

The GDPR UK applies to the UK only. GDPR UK is based on the GDPR EU which applies all countries within the EU and European Economic Area ("EEA"). The EU and the UK have agreed adequacy status for the continued free flow of personal data within the UK, EU and EEA. We will ensure that there is adequate security and comparable legislation in place before sending your information to other countries outside the EEA. In accordance with the DPA and GDPR UK, if we need to transfer data outside the EEA and the country it's transferred to is not on an approved list for having adequate security controls in place, we will limit the amount of personal data we send. We will also impose contractual obligations (standard contractual clauses) in accordance with the



European Data Protection Board ("EDPB") from the recipients to ensure the security and confidentiality of your personal data to safeguard your information.

Whilst we always endeavour to keep our data in the UK and limit data transfers, we do use a cloud services provider for our customer data. Data back-ups are held outside the UK in accordance with GDPR for business continuity reasons. As with most global cloud service providers, the use of global back-up systems is commonplace.