

L X Trix Ltd

Privacy Policy – Protecting your Personal Information

The privacy Notice tells you what to expect in relation to 'Personal Data' (or 'personal information') about you, which is collected, handled, processed and stored by us. The processing of Personal Data is governed by the General Data Protection Regulation 2016/679 (the "GDPR").

In summary, what is the GDPR and our Data Privacy Policy all about?

Individuals have eight rights. These are:

- **The right to be informed** – How we use your personal data
- **The right to access** their personal data
- **The right to be forgotten** and have their data deleted in specific circumstances
- **The right to data portability** to transfer their data to another service provider
- **The right to have information corrected** if it's out of date, incomplete or incorrect
- **The right to object** to , or stop their data being processed on certain grounds
- **The right to restrict processing**, meaning they can request that their data is only kept on file and not used for processing
- **Rights in relation to automated decision making and profiling**, meaning that in some cases individuals have the right not to be subject to a decision that is based on an automated process

The law requires that the eight data protection principles are followed in the handling of personal data.

L X Trix Ltd's new Privacy Notice will include the following standards that personal data must be:

- 1) Fairly, transparently and lawfully processed.
- 2) Obtained and processed for limited purposes and not in any manner incompatible with those purposes.
- 3) Adequate, relevant and limited to only data that is necessary to perform the purpose for which it was obtained.
- 4) Accurate and up to date.
- 5) Not kept for longer than is necessary.
- 6) Processed in accordance with the data subject's rights.
- 7) Secure.

We are committed to following these values and will be open and transparent about the purposes for which we will use your data.

Who are we?

L X Trix Ltd is the data controller, this means it decides how your personal data is collected, handled, processed and stored, and for what purposes. If any of your personal information changes, you believe that any of the information we hold is incorrect or you have any queries with regard to

your personal information or our data protection policies and procedures, then please contact us at liz.farmer@lxtrix.co.uk.

What is personal Data?

According to the law, 'Personal Data' means any information relating to an identified or identifiable individual; an identifiable person is one who can be identified, directly or indirectly in particular by reference to an identification number (e.g. social security number) or one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity (e.g. name and first name, date of birth, biometrics data, fingerprints, DNA...)

('Data subject'); an identifiable individual person who can be identified, directly or indirectly from that data. Identification can be the information alone or in combination with other information that is within our possession, control or from other information to which we legally have access to.

What is the legal basis for processing your Personal Data?

All Personal Data that we process, will be in accordance with one or more of the following legal basis':

- Consent from the individual (or someone authorised to consent on their behalf).
- Where it is necessary in connection with a contract between us and an individual or an individual that is authorised to represent a non-natural person with whom we have contractual relationship.
- Where it is necessary because of legal obligation – if the law says you must, you must.
- Where it is necessary in an emergency, to protect an individual's 'vital interests'.
- Where it involves the exercise of a public function – i.e. most activities of most government, local government and other public bodies.
- Where it is necessary in our legitimate interests, as long as these are not outweighed by the interests of the individual.

How do we protect your personal Data?

L X Trix Ltd aim to protect your Personal Data, and complies with its obligations under the GDPR, by:

- Keeping Personal Data up to date;
- Only storing information in secure locations;
- Destroying information that is no longer relevant;
- Not collecting or retaining unnecessary or excessive amounts of data;
- Protecting Personal Data from loss, misuse, unauthorised access and disclosure;
- Ensuring that appropriate technical measures are in place to protect Personal Data.
- Ensuring that we undertake suitable due diligence checks on 3rd parties who have legal basis for processing Personal Data.

Please note that we have a legal obligation under GDPR that we must notify any data breach to the controller without undue delay. *L X Trix Ltd* therefore has processes and procedures in place for identifying, reviewing and promptly reporting data breaches to the relevant controller.

What do we use your Personal Information for?

We use Personal Data to:

- Fulfil our contractual obligations to business or individuals, for goods and services that have been requested/provided;
- Verify identity, which may include individuals/businesses where a contractual relationship is proposed or exists, in order to assess credit and other commercial risks to our business.
- Provide you with information, news, events and activities that is relevant to the goods or services that are contractually providing to you or consuming from you;
- Provide you with news, events and activities, for which you have consented to us to do so.

Who else has access to your Personal Data?

To ensure that our business operates in an efficient and complaint manner, Personal Data provided to our business may be processed either as part of providing you/providing us with goods and services for which we have contractual obligation or in order to manage our own business (the latter supports our 'legitimate interests' as a business).

In order to provide you/us with the goods and services that we/you have agreed to provide, there are a number of 3rd parties who may need to process your Personal Data:

- Product and service providers whom we may be contractually obligated to engage with on your behalf.
- Insurance providers and intermediaries that are engaged to mitigate risks to our business.
- Other 3rd parties, based upon our 'legitimate interests' as a business, examples may include, data centres that securely store your information, Banks that require relevant personal data in order to fulfil, on our behalf, our obligations to you.
- Any statutory, government or regulatory body that requests Personal Data that we are obligated by Law or regulation, to provide.
- 3rd party institutions which you may have entered into a contact with, whilst in the course of your engagement with *L X Trix Ltd*. You should be aware that the 3rd party will become the 'data controller' of any of the Personal Data that is provided to them either by you or by us, with your consent, however if you engagement with *L X Trix Ltd* were to end, this would not necessarily end your engagement with the 3rd party.

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary, however there are circumstances when we retain Personal Data for a longer period:

- Where we have a statutory or regulatory obligation to retrain the Personal Data;
- To ensure that our business is properly run in an efficient and compliant manner.

What are your rights?

Unless subject to an exemption under the GDPR, you have the following rights in respect to your Personal Data:-

- To request a copy of your personal data which we hold about you (Access);
- To request that we correct any personal data if it is found to be inaccurate or out of date (Rectification);
- To request your personal data is erased, unless there is a legitimate reason for us not to comply (we will always provide you with more details about your Rights in our response to your request) (Erasure - 'Right to be forgotten');
- Request that your personal data is only kept on file and not used for processing (The Right to Restrict Processing)
- You have in some cases the right not to be subject to a decision that is based on an automated process (Rights in relation to automated decision making and profiling)
- To transmit that data directly to another data controller, (Portability);
- To lodge a complaint with the Information Commissioners Office.

If you wish to exercise any of your rights, please see our 'Contact Details' section below.

Contact Details

To exercise all relevant rights, queries or complaints please contact us:

Email: liz.farmer@lxtrix.co.uk

Tel: 01749 823162

Post: 12 Lockey Road, Shepton Mallet. Somerset. BA4 5RQ

You can also contact the Information Commissioners Office by

Email: <https://ico.org.uk/global/contact-us/email/>

Tel: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF