



PRIVACY POLICY

Last updated: 1st April 2021

In respect of Lumo One Ltd

Privacy

This policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [LINK: here:]

[Data We Collect About You](#)

[How We Use Your Data](#)

[How We Secure Your Data](#)

[How Long We Store Your Data](#)

[Disclosure to Third Parties](#)

[Your Rights](#)

Lumo One Ltd is committed to protecting and respecting your privacy.

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). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed, stored and disclosed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Our processing of any personal data we collect from your use of www.lumolist.com (the **Site**) or using Lumo One Ltd's mobile application (the **App**) or using any services offered through or associated with our Site or App (the **Services**), will be in accordance with the practices described in this policy.

The Site and the App are owned and operated by Lumo One Ltd (10866282) of 2nd Floor, Hygeia House, 66 College Road, Harrow, Middlesex, England, HA1 1BE (our **Company Address**). Lumo One Ltd processes personal data as a Data Controller, as defined in the Directive and the General Data Protection Regulation (**GDPR**).

The Site and the App contain links to and from the websites of our partner networks, advertisers and affiliates or to websites shared by other users. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

1. Data We Collect About You

We collect and process personal information so we can provide our Services to you. It's 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.

The data we collect and process about you is explained in the sections below.

1.1 Data You Give Us

You give us information about you by filling in forms on our Site or App or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the Site **or App**, subscribe to our marketing database, subscribe to our services, search for a product, enter a competition, promotion or survey, report a problem with the Site. The information you give us includes [names and email address or login details.] [HG1] You may also include personal data in an equipment list you generate by means of the App.

We rely upon your consent to use and process the data described above, which we obtain when you accept our Terms & Conditions and Privacy Policy when registering to use the Site.

1.2 Data We Automatically Collect

Each time you visit or use our Site, we automatically collect the following information:

- **technical information**, including the Internet protocol (IP) address or mobile device ID used to connect your computer to the Internet, your login information, browser type and version, time zone setting, location, network data, browser plug-in types and versions, languages, operating system and platform;
- **information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site and the App (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

We use this information as statistical data about your browsing actions and patterns, for system administration, and to evaluate, provide, protect or improve our Services (including by developing new products and services). Because we collect, use and share this information in the aggregate, it does not identify any individual.

1.3 Data We Receive From Third Parties

If you purchase a subscription to use Lumolist, we will receive information about your subscription from the app store by means of which you pay for it.

2. How We Use Your Data

We use your data to provide our Site, App and Services in the following ways. The 'Legal Basis' on which we rely for each use is also stated. More detail on each Legal Basis is set out in section 6 below:

- To administer and manage your account, to provide you with information you request from us, and to carry out any other obligations arising from any contracts entered into between you and us. Legal basis: Performance of a contract.
- To ensure that content from our Site and App is presented in the most effective manner for you and for your device.[HG4] Legal basis: Performance of a contract; legitimate interest.
- To allow you to participate in interactive features of our Service when you choose to do so. Legal Basis: Performance of a contract.
- To respond to communications from you; Legal Basis: Legitimate Interest
- to provide you with information about our Services, including notifying you about changes to our Site, App or Services.[HG6] Legal Basis: Legal Obligation (where we are legally obliged to notify you of something); Consent (where we are sending promotional information).

We also use your data to make our Site, App and Services better in the following ways:

- To administer the Site and App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. Legal Basis: Legitimate Interest.
- As part of our efforts to keep the Site and App safe and secure, e.g. by conducting analysis required to detect malicious data and understand how this may affect your IT system.[HG7] Legal Basis: Legitimate Interest.

We will not send you any unsolicited marketing without your prior consent and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under applicable data protection laws. [AM8] [HG9] . If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have expressly consented to this.

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. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please notify us in writing or by email at info@lumolist.com.

3. How We Secure Your Data

All of your personal information is protected and we have put in place appropriate physical, electronic, and management procedures to safeguard and secure the data we collect. Your information is stored on secure cloud databases, internal servers, and on third-party software. The transfer of data between the application and server is done so through an API (Application Program Interface). This transfer is encrypted using HTTPS. Your information is only accessible by employees who have authorised access rights to such information. All of your payment information is encrypted using SSL technology.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or App; any transmission is at your own risk. Once we have received your information, we use strict procedures and the security features described above to try to prevent unauthorised access.

4. How Long We Store Your Data

We only keep your personal information for as long as it's necessary for our original legitimate purpose for collecting the information and for as long as we have your permission to keep it. If you choose to delete your account it is automatically removed from our server. This includes the user account information along with all content added through the account. This is not retrievable. Alternatively, you may contact us at info@lumolist.com to have some or all of your data removed.

5. Disclosure to Third Parties

5.1 Parties with whom we share your information

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We use third parties such as Dodo Apps Ltd (<https://dodoapps.io/>) to design and develop the Services. Web Hosting & Marketing are provided to us by Wix.com, and consequently, they have access to data we collect by means of our site. Any personal data stored in the App is hosted on our behalf by Amazons AWS Cloud Platform (aws.amazon.com). We use Wix.com as an email marketing service. These third parties have access to data we share with their platforms. All of them are subject to contractual terms under which they process the data for our purposes as a 'data processor'.

Some of these external third parties are based outside the UK so their processing of your personal data will 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:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further details, see [here].

We may use specific contracts approved by the UK which give personal data the same protection it has in the UK. For further details, see [here].

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

The **only** other circumstances under which we would share your personal data are:

- If the third party is a member of our group (which means any subsidiaries or ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006).
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If the Company or substantially all of its assets are acquired by a third party, in which case personal data will be one of the transferred assets and the purchaser will be permitted to use the data for the purposes for which it was originally collected by us.
- If we're under a duty to disclose or share your personal data in order to comply with any legal obligation, enforce or apply our Terms & Conditions and other agreements, or to protect the rights, property, or safety of the Company, our customers, or others (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

6. Your Rights

6.1 Lawful Bases

We will ensure that your personal data is processed lawfully, fairly, and transparently and that it will only be processed if at least one of the following bases applies:

- Consent: You have given your clear consent to the processing of your personal data for a specific purpose.
- Performance of a contract: Processing is necessary for the performance of a contract to which you are a party (or for us to take steps at your request prior to entering into a contract with you).

- Legal Obligation: Processing is necessary for our compliance with the law.
- Processing is necessary to protect someone's life.
- Processing is necessary for us to perform a task in the public interest or in the exercise of official authority and the task/function has a clear basis in law.
- Legitimate interests: Processing is necessary for our legitimate interests or the legitimate interests of a third party, except where there is a good reason to protect your personal data which overrides those legitimate interests, such as allowing us to effectively and efficiently manage and administer the operation of our business, maintaining compliance with internal policies and procedures, monitoring the use of our copyrighted materials, offering optimal, up-to-date security and obtaining further knowledge of current threats to network security in order to update our security.

6.2 Data Subject Rights

Under the GDPR, you have the right to:

- Withdraw your consent to the processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so (such as to comply with a legal obligation).
- Be informed of what data we hold and the purpose for processing the data, as a whole or in parts.
- Be forgotten and, in some circumstances, have your data erased by ourselves and our affiliates (although this is not an absolute right and there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it).
- Correct or supplement any information we hold about you that is incorrect or incomplete.

- Restrict the processing of the information we hold about you (for example, so that inaccuracies may be corrected—but again, there may be circumstances where you ask us to restrict processing of your personal data but we are legally entitled to refuse that request).
- Object to the processing of your data.
- Obtain your data in a portable manner and reuse the information we hold about you.
- Challenge any data we use for the purposes of automated decision-making and profiling (in certain circumstances—as above, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request).
- Complain to a supervisory authority (e.g. the Information Commissioner’s Office (ICO) in the UK) if you think any of your rights have been infringed by us. (We would, however, appreciate the chance to address your concerns, so please contact us prior to taking this step).

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

You have the right to ask us not to process your personal data for marketing purposes. We will get your express opt-in consent before we use your data for such purposes or share your personal data with any third parties for such purposes, but you can exercise your right to prevent such processing by contacting us at the Company Address, via email at info@lumolist.com, or by unsubscribing using the links contained in the marketing emails.

You may revoke your consent for us to use your personal data as described in this Privacy Policy at any time by emailing us at info@lumolist.com, and we will delete your data from

our systems. To enforce any of the above rights, please contact us at our Company Address or via email at info@lumolist.com.

We will notify you and any applicable regulator of a breach of your personal data when we are legally required to do so.

Changes To Our Privacy & Cookie Policies

Any changes we may make to our Privacy & Cookie Policies in the future will be posted on this page and, where appropriate, notified to you by email. You will be deemed to have accepted the terms of the updated Privacy & Cookie Policies on your first use of the Site or App following the alterations. Please check back frequently to see any updates or changes to our Privacy & Cookie Policies.

Contact

Questions, comments and requests regarding this Privacy & Cookie Policy are welcomed and should be addressed to our Company Address or to our email at info@lumolist.com.