

PRIVACY NOTICE

Leonard Curtis Business Solutions Group (LCBSG) and all affiliates and subsidiaries, Leonard Curtis Recovery Limited, Leonard Curtis Limited, LC Risk Management Limited, LC Debt Solutions Limited, Leonard Curtis Legal Limited, Corporate Strategies plc and Reach Commercial Finance Limited is committed to complying with all applicable data privacy and security including, but not limited to, the EU General Data Protection Regulation (GDPR).

Data We Collect

LCBSG collects the following categories of personal data for marketing and business development purposes.

1. Contact details – We may collect information about data subjects such as name and contact details ,email, phone number, etc. in order to communicate and facilitate the provision of our services with our clients or potential clients. This may include contact details of individuals who work for or on behalf of the clients.
2. Services details – Personal data may be provided to us by clients to the extent required to perform our services. LCBSG may also acquire personal data from a third party at the direction of our client as required to perform some of our services.
3. Marketing information – LCBSG may collect information to respond to inquiries regarding our products and services or to provide you with information, reports, or updates.
4. Website visitor information – when you visit our website, we may collect information about your visit such as your IP address and the pages you visited and when you use our services we may collect information on how you use those services. Please see our Website Use and Cookies Policy for additional information.

Clients and other third parties who provide personal information to LCBSG must do so in compliance with applicable data privacy regulations.

Processing of Personal Data

We collect personal data to offer and administer our services and products.

The data you provide to us will be processed in accordance with the purposes specified in this notice, namely:

- To provide the products or perform the services requested by clients and individuals pursuant to a letter of engagement, statement of work, or similar (where the processing is necessary for our legitimate business interests in conducting and managing our business)
- To provide the products or perform the services requested by clients and individuals using our website or web applications where the processing is necessary for our legitimate business interests in conducting, managing and developing our business.
- For complying with obligations provided by laws, current regulations and legislation where processing is based on a legal obligation



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- For legitimate business purposes to advise you through e-mail, phone call, or post, in the framework of our ordinary commercial relationship, about other products or services similar to the products or services we have provided to you and that we think will be of interest to you where the processing is necessary for our legitimate business interests.

- For marketing purposes. Your details are stored in LCBSG's client and contacts database. You will receive communications including updates, newsletters and event invitations, which we think are relevant to your interests. Your details will not be given to 3rd parties unless for instance, we run a joint seminar and you book onto it. In all communications, you will be provided with a link to unsubscribe and you are able to unsubscribe at any time. Additionally, you may send a request to unsubscribe to privacy@leonardcurtis.co.uk. When we send you email communications, we use a technology which enables us to track who opens particular articles or emails. This helps us to understand which issues are of most interest and helps us improve our service to you by ensuring you continue to receive useful information. It also helps us comply with data protection law, to ensure that the information we hold about you is correct.

1. For operating and improving LCBSG's website and your customer experience. For example, we may collect and analyse data on your use of our website and process it for the purpose of improving our online experience. Please see our Website Use and Cookies Policy for additional information.

2. For security purposes. For example, we may use your data to protect LCBSG and its third parties against security breaches and to prevent fraud and violation of Leonard Curtis' applicable agreements where the processing is necessary for our legitimate business interests. Whenever we process your personal data for our legitimate interests, we make sure to consider and balance any potential impact on you and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you unless we have your consent or are otherwise required or permitted to by law. You have the right to object to this processing if you wish.

How Data is Processed

Personal data is processed both manually and electronically in accordance with the above-mentioned purposes and in compliance with current regulations. We permit only authorised LCBSG employees and Third-Party processors to have access to your information. Such employees and Third-Party processors are appropriately designated and trained to process data only according to the instructions we provide them.

Storage of Personal Data

LCBSG will retain personal data for a reasonable period, taking into account legitimate business needs to capture and retain such information.

Disclosure/Sharing of Personal Data

We only share your personal data with your consent or in accordance with this policy. We will not otherwise share, sell or distribute any of the information you provide to us except as described in this Privacy Notice.



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- We share personal data among LCBSG controlled affiliates and subsidiaries who act for the Group for the purposes set out in this notice.
- LCBSG may share your information with external third parties, such as vendors, consultants and other service providers who are performing certain services on behalf of the Group. Such third parties have access to personal data solely for the purposes of performing the services specified in the applicable service contract, and not for any other purpose LCBSG requires these third parties to undertake security measures consistent with the protections specified in this notice.
- LCBSG may be required to disclose personal data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.
- If LCBSG enters into a joint venture with or is merged with another business entity, your information may be disclosed to our new business partners.

Your Rights

As a Data Subject you have the following rights concerning your data processed by the Group:

- You have the right to access personal information that the Group holds about you.
- You have the right to ask us to rectify information that the Group holds about you if it is inaccurate or not complete.
- You can request that LCBSG erase your personal data. We will keep basic data to identify you and retain it solely for preventing further unwanted processing.
- You have the right to ask LCBSG to restrict how we process your data. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future.
- Where processing is based on legitimate interests, you have the right to object to LCBSG processing your data. The Group will discontinue processing your data, unless we can demonstrate compelling legitimate grounds for the processing. We will keep basic data to identify you and retain it solely for preventing further unwanted processing.

Please contact privacy@leonardcurtis.co.uk to request access, rectification, or erasure, or to restrict processing, to object to processing, to request data portability.

Providing Information to LCBSG

If you choose not to provide certain personal information, it may be an impediment to the exchange of information necessary for the execution of the contract or provision of services to you and we may not be able to provide you with some services and you may not be able to participate in some of the activities on our website(s).

If at any point you believe retained information is incorrect you can request to see this information and even have it corrected and possibly deleted. Providing you with this information is free of charge, but charges may apply for excessive requests.



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If you wish to raise a complaint on how we have handled your personal data, you can contact our Privacy Manager at privacy@leonardcurtis.co.uk who will investigate the matter, alternatively you can write to her at Leonard Curtis Business Solutions Group 248a Marylebone Road, London NW1 6BB. 020 7535 7000.

Where relevant, you have the right to withdraw consent and object at any time and this means that we cannot process your data provided without your consent.

More information about your rights can be found on the Information Commissioners website. <https://ico.org.uk/>

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO).

Identity and contact details of controller and Privacy Manager

- Leonard Curtis Recovery Limited, Leonard Curtis Limited, LC Risk Management Limited, LC Debt Solutions Limited, Leonard Curtis Legal Limited, Corporate Strategies plc or Reach Commercial Finance Limited is the controller and processor of data for the purposes of the DPA

- If you have any concerns as to how your data is processed you can contact: Nicky Mitchell, National Head of HR who is also our Privacy Manager at privacy@leonardcurtis.co.uk or you can write to her at Leonard Curtis Business Solutions Group 248a Marylebone Road, London NW1 6BB. 020 7535 7000.

Date of last review: 10 May 2018

By: Nicky Mitchell, National Head of HR, LCBSG