

Luceco Plc



Customer Privacy Policy

Updated 16th July 2024

Update Schedule The Customer Privacy Policy (the “Policy”) is reviewed on an as needs basis, but no less than once in any rolling 24-month period and may be amended at any time. The Data Protection Officer (“DP Officer”) will continue to review the effectiveness of this Policy to ensure it is achieving its stated objectives. Recommendations for any amendments should be emailed to the DP Officer (please refer to section 9 below for contact details).

Applicability The requirements in this Policy apply to all existing, past and potential customers of Luceco Plc (“Luceco”) (collectively hereinafter referred to as an “customer”) and to any 3rd party organisations while working or engaged on Luceco business.

Compliance Any employee found to have violated this Policy could be subject to disciplinary action, up to and including termination of their employment. At its sole discretion, Luceco may require the removal from the service provision account of any employee of a 3rd party organisation contractually engaged on Luceco business, who has been evidenced to have violated this policy.

Luceco Plc Limited (“Luceco”, “we”, “us” and “our”)

Data Protection Statement/Privacy Notice (the “Notice”)

PLEASE NOTE: This Notice is applicable to customers, any third parties’ details we hold, and suppliers (hereinafter referred to as “you”, “your”, “customer” and/or “supplier” as appropriate in the particular context) as part of supporting service to you, during your relationship with us. The Notice explains how Luceco and others may use personal information (as defined below).

Luceco is a primarily UK based company specialising in the manufacturing and wholesale of Electric Wiring accessories, LED lighting and home energy management products

If you have:

- Purchased products from Luceco on behalf of your employer or organisation
- Interacted with our sales, customer services and support teams
- Registered a product warranty
- Made a warranty claim or contacted technical support
- Engaged with company marketing channels such as our websites, social media, in person events or CPD training

then, as part of this interaction, you will have supplied or we will have obtained information (“personal information”). The personal information is generally (but not limited to) contact information, job role, interaction records and will be held and used by Luceco to administer the sales and support of its products.

This policy applies to all group companies which currently includes

Luceco UK Limited
DW Windsor Limited
Kingfisher Lighting Limited
D-Line UK
D-Line USA
Luceco Southern Europe
Luceco Middle East FZCO
Luceco México
Luceco USA
Luceco Electrical (Jiaxing) Ltd

The personal information in your application will be held by Luceco in accordance with relevant data protection legislation for the purposes set out in this Notice. It is important that you read this Notice, together with any other privacy notice we may provide on specific occasions when we collect or process your personal information, so that you are aware of how and why we are using such information.

What information do we collect about you?

We may collect, store, and use the following categories of information:

- contact details such as name, title, addresses, telephone numbers, company email addresses and personal email addresses (only where you have contacted us in a personal capacity),

- your Internet Protocol address, and details of which version of web browser you used,
- information on how you use Luceco websites (including data analytics), cookies and page tagging techniques.
- any other information that you volunteer to us through communications between you and Luceco.
- records of communications with Luceco

How is your personal information collected?

We collect your personal information in the following ways:

When you provide it to us directly

You may give us your personal information through contacting us to find details of our services, place an order or manage an order, contact or technical or customer services teams and engage with one of our marketing events

When your personal information is transferred from third parties

Luceco may from time to time obtain personal data about you from a third-party agency such as a marketing or lead acquisition agency

How will we use information about you?

We need this personal information to administer services within the legislative framework set by the UK Government and the UK Administrations. In particular, we need it in order to:

- Process and manage your orders, credit and payments
- Process and manage any warranty claims
- Process and manager any contact with customer services or technical support
- Communicate to you any business operations changes such as (but not limited to) price increases, changes in service and acquisitions
- Record information about meetings and purchasing preferences in our CRM system
- For marketing purposes where we feel the information is relevant to you
- Managing you participation in events such as trade days, industry awards ceremonies and continuous personal development training

We may also use your personal information for the following purposes:

- for research and statistical purposes,
- to allow our business operations to be audited,
- to maintain or develop systems and processes, and
- improving service levels.

Legal Basis for Processing Your Personal Information

We must have a legal basis for processing your personal information. The legal bases for processing personal information are set out in data protection legislation. Some of the above bases for processing will overlap with others, so there may be more than one legal basis which justifies us using your personal information.

We will primarily process your personal information in order to fulfil our task of managing your purchasing and customer service experience with us

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider it is necessary to use it for another purpose and that purpose is compatible with the original purpose. If we need to use your personal information for a different purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data Sharing

We may share your personal information with third parties where required by law or where it is necessary to process your orders, credit and warranties. For example:

Who we share your information with Why we share your information

- **Contracted Third Parties**
To help Luceco meet service delivery needs, we may share your personal information pursuant to data sharing agreements which include data protection safeguards.

Luceco uses trusted third parties to store and process data as part of commercially available cloud hosted systems. Current suppliers include

Microsoft – Email, instant messaging and general file storage

Salesforce – Customer relationship management and marketing automation

Epicor – Sales order processing and financial management

Sage – Sales order processing and financial management

Transferring Information Outside the EU

We may transfer the personal information we collect about you to other countries outside the EU in carrying out the specific purposes that the personal information was collected for. We will only transfer your personal information to other countries outside of the EU whose data protection laws offer an equivalent or greater level of protection than EU and UK data protection laws. Where this is not possible, we will ensure appropriate safeguards are in place to ensure that your personal information is protected.

For more information about transfers of your personal information outside the EU, please contact the

Data Protection Officer

Luceco Plc

Luceco National Distribution Centre

Stafford Park 1

Telford

TF3 3BD

Email: data.protection@luceco.com

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach, and we will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

Luceco retains your personal information in order to:

- Facilitate ordering, customer service and warranty claims
- Provide historical data analytics to improve group operations
- allow the group accounts to be audited,
- maintain or develop systems and processes,
- improve customer satisfaction,
- provide you with customer services, respond to any questions you may have and update your account information,
- Hold a record of achievements in continuous personal development we have provided

We will only retain your personal information for as long as it is necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, as well as any relevant legal requirements. In some circumstances we will retain personal data indefinitely, generally for the purposes described above.

For more information on data retention, contact the
Data Protection Officer
Luceco Plc
Luceco National Distribution Centre
Stafford Park 1
Telford
TF3 3BD
Email: data.protection@luceco.com

In some circumstances we may anonymise [or pseudonymise] your personal information so that it can no longer be associated with you, in which case we may use such information without giving you any further notice.

Rights of Access, Correction, Erasure, and Restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. You are obliged to let us know if your personal information changes e.g. any contact details that you have provided as part of supporting an application, during your relationship with us. Your rights in connection with personal information

You have the following rights in relation to your personal information:

- Request access to your personal information: You have a right to have access to the personal information which we hold about you, subject to certain limitations. This is referred to as a data subject access request, or DSAR. Contact the data protection officer if you wish to exercise this right.
- Request correction of your personal information: You have a right to have your personal information corrected, or rectified, if it is inaccurate or incomplete. If you become aware that any of the data which we hold about you is inaccurate, you should contact us as soon as practicable. You must notify us immediately on becoming aware of any change of circumstances which require changes to be made to any of the personal information which we hold about you.

- Request erasure (or deletion) of your personal information: You have a right to request the deletion or removal of your personal information where there is no compelling reason for its continued processing. Your right to make such a request will arise in specific circumstances, for example, where data is no longer necessary for the purpose for which it was collected or where you withdraw your consent for processing your data (and this is the sole basis on which your data is processed). If you would like to exercise this right, you must submit a written request specifying the information which you wish deleted. We will then consider this request in accordance with our obligations under data protection laws.
- Request the restriction of processing of your personal information: You have a right to block or suppress the processing of your personal information in certain circumstances. If for example you contest the accuracy of the personal data, processing may be restricted until the accuracy of the personal information has been verified. This may also apply where you contest that the processing is unlawful. If you would like to exercise this right, you must submit a written request specifying the information which you would like us to impose a processing restriction.
- Request the transfer of your personal information to another party: You have a right to obtain and re-use your personal information for your own purposes across different services – this is referred to as the right to data portability. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. If you would like to exercise this right, you must submit a written request to specifying the information which you wish to be transferred. Where the right applies, we are obliged to comply with any such request within one month.
- Object to us processing your personal information: You have the right to object to the processing of your personal data if it is based on the performance of a task carried out in the public interest. If you would like to exercise this right, you must submit a written request to outlining the grounds upon which you object. We will consider any request in accordance with our obligations under data protection laws.

If you want to exercise any of these rights, please write to:

Data Protection Officer
 Luceco Plc
 Luceco National Distribution Centre
 Stafford Park 1
 Telford
 TF3 3BD
 Email: data.protection@luceco.com

Please note that we may need to request specific information from you to help us confirm your identity and ensure that we comply with the right you are exercising. We are obliged to comply with any such requests within one month. This may be extended by an extra two months if we consider the rectification request to be complex.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to us processing your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please see the relevant contact numbers listed on page one of this notice or write to the Data Protection Officer at the below address. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you

originally agreed to, unless we are required to do so by law, or have another legitimate basis for doing so in law.

Data Protection Officer and Right to Complain

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with this Notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO:

Data Protection Officer
Luceco Plc
Luceco National Distribution Centre
Stafford Park 1
Telford
TF3 3BD
Email: data.protection@luceco.com

You also have the right to make a complaint at any time to the Information Commissioner’s Office (“ICO”), the UK supervisory authority for data protection issues about the way in which we process (or have processed) your personal information. You can contact the ICO by writing to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Email: icocasework@ico.org.uk
Telephone: 0303 123 1113

Changes to this Notice

We reserve the right to update this Notice at any time. We may also notify you in other ways from time to time, about the processing of your personal information.