



# Data Protection Policy

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1. Introduction
  - 1.1 Luke Hughes & Company Limited (LHCL) is committed to safeguarding the privacy of our clients, website visitors, and marketing subscribers.
  - 1.2 This policy applies where we are acting as a data controller with respect to the personal data of clients, website visitors, and marketing subscribers; in other words, where we determine the purposes and means of the processing of that personal data.
  - 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask for your consent to our use of cookies when you first visit our website.
  - 1.4 Our website incorporates privacy controls which affect how we process your personal data. By using these privacy controls, you can specify whether you would like to receive direct marketing communications and limit the use of your information. You can access your marketing preferences and unsubscribe by using the following links:

To unsubscribe follow this link:

[https://info.lukehughes.co.uk/hs/manage-preferences/unsubscribe-all-test?d=VmYj7270cbjFVKgD3Q3\\_YlyBW2m3bL73\\_YlyBN1JxwY5GKd\\_PM20N5Wjr4FTW2IHxkH7bb\\_TMF3JqbFG8H7G1&v=3&utm\\_source=hs\\_email&utm\\_medium=email&\\_hsenc=p2ANqtz- --DnrP00hM4xAt5Z5Pd26vQieW534PH6-GhBJl\\_n4b\\_LjVE97\\_-Ubg0i7E2Z6w3wbY9n0](https://info.lukehughes.co.uk/hs/manage-preferences/unsubscribe-all-test?d=VmYj7270cbjFVKgD3Q3_YlyBW2m3bL73_YlyBN1JxwY5GKd_PM20N5Wjr4FTW2IHxkH7bb_TMF3JqbFG8H7G1&v=3&utm_source=hs_email&utm_medium=email&_hsenc=p2ANqtz- --DnrP00hM4xAt5Z5Pd26vQieW534PH6-GhBJl_n4b_LjVE97_-Ubg0i7E2Z6w3wbY9n0)

To manage preferences, follow this link:

[https://info.lukehughes.co.uk/hs/manage-preferences/unsubscribe-test?d=VmYj7270cbjFVKgD3Q3\\_YlyBW2m3bL73\\_YlyBN1JxwY5GKd\\_PM20N5Wjr4FTW2IHxkH7bb\\_TMF3JqbFG8H7G1&v=3&utm\\_source=hs\\_email&utm\\_medium=email&\\_hsenc=p2ANqtz- --DnrP00hM4xAt5Z5Pd26vQieW534PH6-GhBJl\\_n4b\\_LjVE97\\_-Ubg0i7E2Z6w3wbY9n0](https://info.lukehughes.co.uk/hs/manage-preferences/unsubscribe-test?d=VmYj7270cbjFVKgD3Q3_YlyBW2m3bL73_YlyBN1JxwY5GKd_PM20N5Wjr4FTW2IHxkH7bb_TMF3JqbFG8H7G1&v=3&utm_source=hs_email&utm_medium=email&_hsenc=p2ANqtz- --DnrP00hM4xAt5Z5Pd26vQieW534PH6-GhBJl_n4b_LjVE97_-Ubg0i7E2Z6w3wbY9n0)

- 1.5 In this policy, "we", "us" and "our" refer to Luke Hughes & Company Limited. [For more information about us, see Section 11.]
2. How we use your personal data
    - 2.1 This section covers:
      - (a) the general categories of personal data that we may process;
      - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
      - (c) the purposes for which we may process personal data; and



- (d) the legal basis of the processing.
- 2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Hubspot and Google Analytics. This usage data may be processed for the purposes of analysing the use of the website and services and improving your user experience. The legal basis for this processing is your consent OR our legitimate interests, namely monitoring and improving our website and services. Please note that the existence of this data does not mean we can identify you as a person.
- 2.3 We may process your account data ("account data"). The account data may include your name, email address and business address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is your consent OR our legitimate interests, namely the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR for the purposes of offering, marketing and selling relevant goods, services and/or advice to you.
- 2.4 We may process information contained in any enquiry you submit to us either directly or indirectly regarding goods and/or services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods, services and/or advice to you. The legal basis for this processing is your consent.
- 2.5 We may process information that you provide to us for the purpose of subscribing to our 'Company Updates' emails, newsletters, electronic marketing and direct mail ("notification data"). The notification data may be processed for the purposes of sending you these communications. The legal basis for this processing is your consent OR the performance of a contract between you and us or taking steps, at your request, to enter into such a contract.
- 2.6 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure]. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.7 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.8 In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.9 Please do not supply any other person's personal data to us, unless we prompt you to do so.





### 3. Providing your personal data to others

- 3.1 We will never disclose your personal data to a third party, with the exception of such disclosure being necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### 4. Retaining and deleting personal data

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

- 4.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

#### 4.2 We will retain your personal data as follows:

- (a) full name, last name or both;
- (b) email address that you have used to communicate with us;
- (c) the business name denoted by the URL in your email address;
- (d) the business sector of that business;
- (e) business address of that business or any other address that you give us;
- (f) your job title.

- 4.3 It is not possible for us to specify in advance how long your personal data will be retained. If you have transacted with us our systems will keep that data as long as they exist for warranty and recall purposes.

- (a) the period of retention of your personal data will be determined based on the continued communication of our 'Company Updates' via email and post.

- 4.4 Notwithstanding the above we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### 5. Amendments

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 5.3 Unless you have opted out of receiving emails from us, we will notify you of any significant changes to this policy by email.

### 6. Your rights



This section summarises your rights under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights. In all instances below we will only release data to you once your own identity has been validated by us. If you do not pass our identity validation checks we will not release data to you.

## 6.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data free of charge.

6.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

6.5 You have the right to the erasure of your personal data without undue delay. The general exclusions include where processing is necessary: for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims or for warranty, recall or product safety purposes.

6.6 You have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; recall or product safety purposes; or for reasons of important public interest.

6.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling



legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

- 6.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 6.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest. We may however process aggregated data containing your personal data as long as it does not identify you as a person.
- 6.10 To the extent that the legal basis for our processing of your personal data is:
- (a) your consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 6.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the state or country of your habitual residence, your place of work or the place of the alleged infringement.
- 6.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal or retention and processing after withdrawal where expressly set out above.
- 6.13 You may exercise any of your rights in relation to your personal data by written notice to us OR by email.
7. About cookies
- 7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 7.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 7.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.





8. Cookies that we use

8.1 We use cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website (cookies used for this purpose are: identify cookies);
- (c) personalisation - we use cookies [to store information about your preferences and to personalise the website for you (cookies used for this purpose are: identify cookies);
- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally (cookies used for this purpose are: identify cookies);
- (f) analysis - we use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are: identify cookies); and
- (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally (cookies used for this purpose are: identify cookies).

9. Cookies used by our service providers

9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

9.2 We use Google Universal Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:  
<https://policies.google.com/privacy/update?hl=en-GB&gl=uk>.

9.3. We use Hubspot to manage our client database and marketing content. This includes our brochures, presentations, blog and marketing emails. The information gathered relating to our website and marketing activity is used to inform us of the best way to manage our client relationships and create relevant marketing material and campaigns. Hubspot's privacy policy is available at:  
<https://legal.hubspot.com/privacy-policy>

The relevant cookies are:

hubspotapi  
hubspotapi-csrf  
hubspotapi-prefs  
\_\_hs\_opt\_out  
\_\_hs\_do\_not\_track  
\_\_hs\_initial\_opt\_in  
\_\_hs\_cookie\_cat\_pref  
hs\_ab\_test  
hs-messages-is-open  
hs-messages-hide-welcome-message  
\_\_hsmem





hs\_langswitcher\_choice  
T\_\_cfduid  
\_\_cfuid  
\_\_hstc  
hubspotutk  
\_\_hssc  
\_\_hssrc

## 10. Managing cookies

10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

10.2 Blocking all cookies will have a negative impact upon the usability of many websites.

10.3 If you block cookies, you will not be able to use all the features on our website.

The relevant cookies are:

Google analytics cookies - 9.2

APISID  
HSID  
SID  
SAPISID  
NID  
SIDCC  
SSID  
\_\_Secure-3PAPISID  
\_\_Secure-3PSID  
\_\_Secure-APISID  
OTZ  
DV

## 11. Our details

11.1 This website is owned and operated by Luke Hughes & Company Limited.



Luke Hughes

- 11.2 We are registered in England and Wales under registration number 1952292 and our registered office is at 7 Savoy Court, London, WC2R 0EX.
- 11.3 Our principal place of business is at 7 Savoy Court, London, WC2R 0EX.
- 11.4 You can contact us:
- (a) by post, to 7 Savoy Court, London, WC2R 0EX;
  - (b) by email, using [gdpr@lukehughes.co.uk](mailto:gdpr@lukehughes.co.uk).

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Signed:

Date: November 2020

