

# Lucra Privacy Policy

## Preamble

Lucra respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tells you about your privacy rights and how the law protects you.

## 1 Important information and who we are

### 1.1 Purpose of this privacy policy

- (a) This privacy policy aims to give you information on how Lucra collects and processes your personal data through your use of this website and/or use of our services or otherwise, including any data you may provide through this website when you register as a customer and/or use our services.
- (b) This website is not intended for children and we do not knowingly collect data relating to children.
- (c) It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

### 1.2 Controller

- (a) Lucra Technologies Limited is wholly owned by Vandelay Holdings Limited. This privacy policy is issued on behalf of Vandelay Holdings Limited and its subsidiaries (the “**Lucra Group**”) so when we mention “**Lucra**”, “**we**”, “**us**” or “**our**” in this privacy policy, we are referring to the relevant company in the Lucra Group responsible for processing your data. Lucra Technologies Limited is the controller and responsible for this website.
- (b) We have appointed a data protection officer (the “**DPO**”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### 1.3 Contact details

- (a) If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:
  - (i) Full name of legal entity: Lucra Technologies Limited
  - (ii) Email address: [privacy@lucra.cc](mailto:privacy@lucra.cc)
  - (iii) Postal address: 110-112 Lancaster Road, Barnet, England, EN4 8AL
- (b) You have the right to make a complaint at any time to a supervisory authority, a regulatory body who oversees data protection issues. The supervisory authority in the UK is the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us in the first instance.

### 1.4 Changes to the privacy policy and your duty to inform us of changes

- (a) We keep our privacy policy under regular review. This version was last updated on 14 September 2022.
- (b) It is 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.

### 1.5 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2 The data we collect about you

2.1 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).

2.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) Identity Data includes first name, last name, nationality, and date of birth.
- (b) Contact Data includes residential address, billing address, email address and telephone numbers.
- (c) Financial Data includes bank account details.
- (d) Transaction Data includes details about payments to and from you in relation to transactions and other details of the services you receive from us.
- (e) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- (f) Profile Data includes your username or similar identifier and password, feedback and survey responses.
- (g) Usage Data includes information about how you use our website and our services.
- (h) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

2.3 We also collect, use and share aggregated data such as statistical data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

2.4 Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the services. In this case, we may have to cancel such services and any agreements you have with us but we will notify you if this is the case at the time.

### 3 How is your personal data collected?

We use different methods to collect data from and about you including through:

- 3.1 **Direct interactions.** You may give us your Identity, Contact, Financial Data and Transaction Data by creating an account on and using our platform, contacting our sales team, or subscribing to our blog/newsletter. This includes personal data you provide when you:
- (a) create an account on our platform;
  - (b) use our services offered on our platform;
  - (c) request marketing to be sent to you;
  - (d) enter a survey; or
  - (e) give us feedback or contact us.
- 3.2 **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- 3.3 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
- (a) our customers who are law firms and other parties connected to the deal that you may be a party to; or
  - (b) Companies House.
- 3.4 Technical Data from the following parties:
- (a) analytics providers;
  - (b) advertising networks; and
  - (c) search information providers.
- 3.5 Financial Data from technical service providers facilitating our account information services.
- 3.6 Identity and Contact Data from data brokers or aggregators providing identity verification and 'know your customer', 'know your business' and anti-money laundering screening services.

### 4 How we use your personal data

- 4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the below circumstances:
- (a) Where we have your consent.
  - (b) Where we need to perform the contract we are about to enter into or have entered into with you or to take steps at your request before entering into such a contract.
  - (c) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - (d) Where we need to comply with a legal obligation.

## 5 Purposes for which we will use your personal data

5.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

5.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register a person as a new customer and/or user on the Lucra platform	Performance of a contract with you.  In our legitimate interests to provide services to our customers and relevant third parties and to effectively run our business.
Providing our services including validating bank accounts and AML details	Performance of a contract with you.  In our legitimate interests to provide services to our customers and relevant third parties and to effectively run our business.
To communicate with you about our services, our website, or our business	Performance of a contract with you.  In our legitimate interests to provide services to our customers and relevant third parties and to effectively run our business.
To carry out identity checks and other screening checks required in connection with our services	In our legitimate interests to provide services to our customers and relevant third parties and to effectively run our business.
To collect and recover money owed to us	In our legitimate interests (to recover debts due to us).
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	Performance of a contract with you.  To comply with a legal obligation.  In our legitimate interests (to keep our records updated and to study how customers use our products/services).
To enable you to complete a survey	Performance of a contract with you.  In our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	In our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).  To comply with a legal obligation.

To use data analytics to improve our websites, services, marketing, customer relationships and experiences	In our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).  Consent (only applicable to individuals that sign up through our website <a href="http://www.lucrapayments.com">www.lucrapayments.com</a> for marketing updates; we do not send marketing materials to users who have created an account with Lucra to access our platform).
To make suggestions and recommendations to you about services that may be of interest to you	Consent (only applicable to individuals that sign up through our website <a href="http://www.lucrapayments.com">www.lucrapayments.com</a> for marketing updates; we do not send marketing materials to users who have created an account with Lucra to access our platform).
To prevent fraud, unlawful acts and fraudulent activity in connection with our services	To comply with a legal obligation.  In our legitimate interests to protect our business, customers and other third parties from fraud and unlawful acts.
To protect our business against legal claims	To comply with a legal obligation.  In our legitimate interests to protect our business.
To anonymise personal data for statistical purposes	In our legitimate interests to improve our services and our business.

### 5.3 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

5.4 We may use your personal data to form a view on what information we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing). We will only send marketing communications in compliance with the law.

### 5.5 Opting out

- (a) 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 using the contact details set out above.
- (b) Where you opt out of receiving these marketing messages, we may still contact you in relation to your use of our services or where required by law.

### 5.6 Change of purpose

- (a) We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

- (b) If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- (c) Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6 Disclosures of your personal data**

### **6.1 Internal third parties**

- (a) We may share your personal data with other companies in the Lucra Group who provide IT and system administration services, provide the services you have requested or authorised, manage risk, help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements and to help us manage our risk profile and the availability and connectivity of our website(s), services and communications.

### **6.2 External third parties**

- (a) We may share your personal data with the following third party processors set out below for the purposes set out in the table in clause 5.2 above. Services providers that perform services and functions at our direction and on our behalf so that we can provide our website and our services. These third-party service providers may assist to provide you with our services, verify your identity, assist in processing transactions, send you advertisements for our products and services, provide customer support, monitor your interactions with our website(s) and other users of our services.
- (b) We may also share your personal data with third parties in the following circumstances:
  - (i) Financial and commercial institutions that we have partnered with to either jointly create and offer products or services, or to be able to offer our services.
  - (ii) Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
  - (iii) Third parties who may invest in our business or to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
  - (iv) HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
  - (v) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

## **7 International transfers**

- 7.1 Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.
- 7.2 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:

- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- (b) Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

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

## 8 Data security

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

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

## 9 Data retention

9.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

9.2 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 your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## 10 Your legal rights

10.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- (a) **Request access to your personal data (commonly known as a "subject access request")** - this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) **Request correction of the personal data that we hold about you** - this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) **Request erasure of your personal data** - this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) **Object to processing of your personal data** - where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation

which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

- (e) **Request restriction of processing of your personal data** - this enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (i) If you want us to establish the data's accuracy.
  - (ii) Where our use of the data is unlawful but you do not want us to erase it.
  - (iii) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - (iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) **Request the transfer of your personal data to you or to a third party** - we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) **Withdraw consent at any time** - where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain goods or services to you. We will advise you if this is the case at the time you withdraw your consent.

10.2 If you wish to exercise any of the rights set out below, please contact us at [privacy@lucra.cc](mailto:privacy@lucra.cc) or visit the Support section of our website for more information.

10.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive to cover the administrative costs of dealing with your request. Alternatively, we could refuse to comply with your request in these circumstances.

10.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10.5 We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.