

# LCC Group Limited

## Updated Privacy Notice

This Privacy Notice applies to the LCC Group of Companies and all related companies and/or subsidiaries, except as may be expressly provided for to the contrary on an LCC website, application or other product.

If you are not in agreement with the content of this Privacy Notice then LCC will regrettably be unable to provide you with services.

### Our contact details

LCC Group Limited  
16 Churchtown Road,  
Cookstown,  
County Tyrone  
BT80 9XD

Co. Registration Number: NI031142  
Website: [www.lccgroup.co.uk](http://www.lccgroup.co.uk).

Data Protection Officer – Ms Aileen Kelly  
Tel: 02886760651  
Email: [aileen.kelly@lissancc.com](mailto:aileen.kelly@lissancc.com)

We do not currently transfer your personal data to outside of European Union or European Economic Area. However, given the forthcoming exit of UK from EU, and in the event that this position changes, we will seek to ensure continued compliance with all applicable GDPR legislation, the Data Protection Act 2018 and all relevant rules and /or recommendations in order to protect your data.

### What type of information we have

We follow the data minimization principle. We collect the minimum amount of personal data needed for the efficient execution of service or delivery of product to you. Examples that we find we require are:

- (a) Personal identifiers, contacts and characteristics (for example, name, address, email address (contact details))
- (b) Banking or debit/credit card details for payments
- (c) Complaints/Feedback from you or content you upload to our website or social network pages
- (d) Photos or videos recorded within our premises

### How we get the information and why do we have it

You may give us information about you by filling in forms in hard copy or the Website, or by corresponding with us (for example, by e-mail or phone calls). This includes information you provide when you register to use or subscribe to any of our services, search for a mobile application or service, make a purchase on the Website, enter a competition, promotion or survey, and when you report a problem with the services we provide.

Each time you visit our Website we may collect the following information:

- technical information, including the type of mobile device you use, a unique device identifier, mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, IP addresses, browser types;
- details of your visits to the Website [including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise] and the resources that you access through the use of cookies. Cookies are small text files stored in your web browser, which can identify you when you visit our website.

We may also monitor and record any communications we have with you, like phone conversations and emails. This is required in order to train staff and monitor our services and to make sure we're meeting our regulatory and legal responsibilities

Most of the personal information we receive and process is provided to us directly by you for one of the following reasons:

- Legitimate Interests
- Lawful Contractual basis

We also receive personal information indirectly, from the following sources in the following scenarios:

- Third Parties or Agents such as those who market and sell our products and who have concluded contracts on our behalf will provide personal data required to fulfil the relevant contracts.

The lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting the Data Protection Officer whose details are provided above.
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a legitimate interest.

## Do we share your information?

1. LCC have a number of group and related companies throughout the UK and Europe therefore it is likely that you could engage in business with more than one LCC legal entity. Your personal data is shared across the LCC Group of companies but at all times the data will remain with the LCC Group system.
2. We may use third party service providers or processors to help us to administer certain activities on our behalf, such as fulfilling purchases, processing credit card payments, performing credit checks, debt enforcement action, providing advertisements, providing CCTV solutions, tracking effectiveness of our marketing campaigns, usage of our websites and apps. As such, to execute such services we may have to share personal data about you with these partners, but only to the extent necessary to perform the services they carry out on our behalf, and ensuring they comply with all data protection rules.
3. LCC might be required to share your personal data with external parties such as HMRC, police, courts, or other government institutions. We will only do so upon receipt of appropriate requests accompanied by sufficient legal basis to support such request.

## What we do with the information

We use the information that you have given us in order to:

- (a) Comply with our obligations under contract with you;
- (b) Where we have not yet got a contract but you have asked us to do something as a first step (eg provide a quote);
- (c) to communicate with you regarding your account or to verify bank/credit card details and take payment;
- (d) to contact you in order to carry out market research in order to improve the goods and services we offer;
- (e) to contact you with details of offers and information about products and services which we believe would be of interest to you;
- (d) To take enforcement action against you or run Credit Checks where you have failed to pay or we suspect you are unable to pay for goods or services that we have provided to you.

## How we store your information

We process personal data in a safe and secure manner. We seek to ensure any IT systems used by us are safe and secure. We use encryption and pseudonymization where suitable. We limit access to personal data to those persons who have need for it. We have guidelines, policies and training available for employees processing personal data and ensure any agents or processors contracted to carry out any service on our behalf have in place reciprocal data protection and security measures.

## How long do we store your information?

Applying the data minimisation principle personal data is not processed longer than necessary. As a general rule data is not retained beyond 6 months dependant on the nature of the data and any regulatory or statutory requirements. For example, we may need to keep data for 7 years where this is required to comply with HMRC requirements, or in the event of contractual disputes the data may be retained until the expiry of the statute of limitations. For further information on the retention timeframe that applies to your data please contact the Data Protection Officer.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact our Data Protection Officer if you wish to make a request.

## How to complain

If you are unhappy with how we have used your data you can complain to our Data Protection officer in writing using the contact details set forth at the beginning of this document.

You can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113