

# **Data Protection (GDPR) Policy**

# OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

Phi Lighting is committed to protecting your privacy and we have a duty of care to the people within our data. We understand data is a liability; it should only be collected and processed when absolutely necessary. Phi Lighting has developed its online services to inform users about news, to market products and to make documentation and programmes readily available. The information provided is used to support the development of the company's websites, products and services. We will never sell, rent or otherwise distribute or make public your personal information.

## PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons:

## 1.1 Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website. Although GA records data such as your geographical location, device, Internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address, which could be used to personally identify you, but Google do not grant us access to this. We consider Google to be a third party data processor (see third party data processors below).

GA makes use of cookies, details of which can be found on <u>Google's developer guides</u>. Disabling cookies on your Internet browser will stop GA from tracking any part of your visit to pages within this website. In addition to Google Analytics, this website may collect information (held in the public domain) attributed to the IP address of the computer or device that is being used to access it.

# **1.2 Security of information**

We store personal information on secure servers with access limited to authorised personnel. We will not release personal details to third parties and we may request proof of identity before we release the information to you.

# 1.3 Contact forms and email links

Should you choose to contact us using the contact form on our contact page, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined below. Instead the data will be collated into an email and sent to us over the <u>Simple Mail Transfer Protocol (SMTP)</u>.

## 1.4 Email newsletter

If you choose to join our email newsletter, the email address that you submit to us will be forwarded to <u>MailChimp</u> who provide us with email marketing services. We consider MailChimp to be a third party data processor (see below).

Your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by <u>requesting removal via email</u>. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

While your email address remains within the MailChimp database, you will receive periodic newsletter-style emails from us.

#### **ABOUT THIS WEBSITE'S SERVER**

This website is hosted by <u>wpengine</u> within a UK data centre located in London.

# **OUR THIRD PARTY DATA PROCESSORS**

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation. Five of these third parties are based in the USA and are <u>EU-U.S Privacy Shield</u> compliant.

- Google (<u>Privacy policy</u>)
- Mailchimp (<u>Privacy policy</u>)
- Survey Monkey (<u>GDPR policy</u>)
- Passle (Privacy policy)
- Twitter (<u>Privacy policy</u>)
- Instagram (<u>Data policy</u>)
- LinkedIn (Privacy policy)

# **DATA BREACHES**

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

## DATA CONTROLLER

The data controller of this website is: Phi Lighting, a UK Private limited Company with company number: 04656474 Whose registered office is: Phi Lighting, C/O Hillier Hopkins LLP, 45 Pall Mall, London SW1Y 5JG

## CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

## Change log