

Lumora Accounting Limited (Trading as Lumora Accounting) Privacy Policy

Welcome to the Lumora Accounting Privacy Policy

Lumora Accounting respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how we look after your personal data when you visit our website (regardless of where you visit it from) or otherwise interact with us. It also outlines your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please refer to the Glossary section for the meaning of certain terms used in this privacy policy.

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1. Important Information and Who We Are

Purpose of this Privacy Policy This privacy policy explains how Lumora Accounting collects, uses, and protects your personal data when you visit our website, purchase services from us, or otherwise interact with us. It also outlines your privacy rights and how UK law protects you.

This policy supplements other privacy notices we may provide and is not intended to override them.

Controller

This policy is issued on behalf of Lumora Accounting Limited (Company No. 16764376), an ICAEW regulated accounting firm operating in the UK. When we mention "Lumora Accounting," "we," "us," or "our" in this policy, we refer to Lumora Accounting Limited, which is responsible for processing your data.

We have appointed a compliance officer, Fraser Harrison, who oversees privacy-related matters. If you have any questions or wish to exercise your legal rights, please contact:

- Email: info@lumoraaccounting.co.uk
- Postal Address: 5 Braysford Square, London, E1 0SG

Third-Party Links

Our website may include links to third-party websites or services. We do not control these external sites and encourage you to review their privacy policies before providing personal data.

2. The Data We Collect About You

Personal data refers to any information that can identify an individual. It does not include anonymised data.

We may collect, use, store, and transfer different types of personal data, including:

- **Identity Data** means first name, maiden name, last name, marital status, title, date of birth and gender, passport details (or other similar form of identification), photographs (by way of identification) and (where you are the representative or employee of a business or organisation) your job title and the name of that business or organisation.
- **Contact Data** means billing address, and business or personal contact information which is your address, email address and telephone numbers.
- **Third Party Data** means details of your dependents or beneficiaries, and your next of kin.
- **Financial and tax Data** means information regarding your salary (or details of other income), payroll records, details regarding your investments or personal tax arrangements pension details and benefits information, your national insurance number or other Governing Body reference number, bank account and credit card details, bank statements and other personal financial details that are relevant to our work. It also means information regarding company tax references, business performance as well as your customer and supplier information.
- **Transaction Data** means credit reference or other background checks, details about payments to and from you or your employer, and other details of services you or your employer have purchased from us.
- **Technical Data** means 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.

• **Usage Data** means information about how you use our website and services including the URL clickstream to, through and from our site (including date and time); pages, resources and/or products you viewed or searched for; page response times, errors, length of visits to certain pages, page interaction, and methods used to browse away from the page, and information about your interaction with our emails, including whether you have opened the email, the number of times the email is accessed, and your interaction with email content including the links you have clicked.

We also collect, use and share Aggregated Data such as statistical or demographic 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. We do not collect special category data (e.g., health or criminal background information) unless explicitly required by law and with your consent.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How Is Your Personal Data Collected?

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

• **Direct interactions.** You may give us your Identity, Contact, Third Party and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- subscribe to our service or publications;
- request marketing to be sent to you; or complete a survey; or
- give us feedback or contact us.

• **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

- **Technical Data** from the following parties:
 - o analytics providers such as Google (both in and outside the UK);
 - o advertising networks
 - o search information providers
 - o sub-contractors providing technical, payment and delivery services
 - o business partners
 - o Software with shared access such as Xero, QBOL, FreeAgent and Sage
 - o HMRC via agent authority access granted to us
- **Identity, Contact and Financial Data** from publicly available sources such as:
 - o Companies House
 - o credit reference bureaus
 - o Smart Search
 - o HMRC

4. How We Use Your Personal Data

We use personal data only where legally permitted. Most commonly, we process data to:

- Provide our services (e.g., accounting, tax advisory, payroll)
- Comply with legal obligations (e.g., HMRC reporting)
- Communicate with you (e.g., service updates, newsletters)
- Improve our website and services (e.g., customer feedback analysis)

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. 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 where more than one ground has been set out in the table below:

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or your employer as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (where we are required to verify your identity) (c) Necessary for our legitimate interests (in order to perform a contract with your employer)
To deliver our services to you or your employer including: (a) to liaise with HMRC, pension providers, insurance providers and underwriters, banks, legal advisers and benefits providers on your behalf; (b) Manage payments, fees and charges (c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Third Party (d) Financial (e) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contact with your employer) (c) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you or your employer 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	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (in order to perform a contract with your employer) (d) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)

To enable you to complete a survey	(a) Identity (b) Contact (c) Usage	Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for 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) (b) Necessary to comply with a legal obligation

Where you are a prospective or existing client or the representative or employee of a client, we will process your personal data for the purposes set out in the table below:

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver relevant website content to you	(a) Identity (b) Contact (c) Usage (d) Technical	Necessary for our legitimate interests (to study how clients use our products and services, to develop them, to grow our business)
To use data analytics to improve our website, products/services, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you or your employer	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

Where you are a prospective or existing client or the representative or employee of a client, we will process your personal data for the purposes set out in the table below:

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To conduct supplier due diligence	(a) Contact (b) Identity	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer)
To register you or your employer as a supplier	(a) Contact (b) Identity	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer)
To make payments to you or your employer	(a) Contact (b) Identity	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer)
To manage our relationship with you or your employer 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	(a) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer) (c) Necessary to comply with a legal obligation
To deliver relevant website content to you.	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer) (c) Necessary for our legitimate interests (to study how suppliers engage with our website).
To use data analytics to improve our products/services, supplier relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of suppliers for our products and services and to develop our business)

Marketing & Opt-Out

We may use your contact details to send marketing communications if you have opted in. You can withdraw consent at any time by contacting us or clicking "unsubscribe" in our emails.

5. Disclosures of Your Personal Data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties such as pension providers, insurance providers and underwriters, banks or other related third parties based in and outside the UK in order to deliver our services to you or your employer.
- External Third Parties which are service providers acting as processors based in and outside the UK who provide services such as travel, insurance and IT services.
- Authorities and regulators, such as HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in and outside the UK who require reporting of processing activities in certain circumstances.
- Professional advisers including lawyers, bankers, auditors and insurers acting as processors or controllers based in and outside the UK who require reporting of processing activities in certain circumstances or who process your personal data for the purpose of delivering their services to us.
- Third parties 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow any third-party service providers who are acting as processor for us to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not outsource accounting work overseas or share data with subcontractors. Any third parties we engage must comply with UK data protection laws.

6. International Data Transfers

We may store or process data outside the UK when using software providers with US-based servers. We ensure appropriate safeguards, such as:

- Adequacy decisions (where applicable)
- Standard contractual clauses with providers

7. Data Security

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.

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.

8. Data Retention

We retain personal data for **seven years**, in line with regulatory requirements. Data may be retained longer if required for legal, tax, or accounting purposes.

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 relation to which your personal data is relevant.

9. Your Legal Rights

Under UK data protection laws, you have rights, including:

- Access: Request a copy of your personal data
- Correction: Update inaccurate or incomplete data
- Erasure: Request deletion of your data (where applicable)
- Objection: Restrict processing for marketing purposes

To exercise these rights, email our compliance officer at info@lumoraaccounting.co.uk.

No fee usually required

You will not have to pay a fee to access your readily available personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if the data has been archived and requires a cost to obtain, your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We will 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 a 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.

Time limit to respond

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.

10. Glossary

Legitimate Interest: The interest of Lumora Accounting in conducting and managing our business to provide you with high-quality, secure services. We balance any potential impact on your rights and freedoms before processing your personal data based on legitimate interests. We do not use your personal data for activities where your interests override ours, unless we have your consent or are otherwise permitted by law. You can request further details on how we assess legitimate interests by contacting us.

Performance of Contract: Processing your data where it is necessary to fulfil a contract with you or to take steps at your request before entering into such a contract.

Comply with a Legal Obligation: Processing your personal data where necessary to comply with applicable legal and regulatory obligations.

Your Legal Rights

You have the right to:

- **Request access** to your personal data (also known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and verify that we are processing it lawfully.
- **Request correction** of any incomplete or inaccurate personal data we hold about you. We may need to verify the accuracy of the new data you provide.
- **Request erasure** of your personal data where there is no valid reason for us to continue processing it. You also have the right to request deletion if you have successfully objected to processing, if we have unlawfully processed your data, or if we are required to erase your data to comply with legal obligations. However, in some circumstances, we may not be able to comply with your request for legal reasons, which will be communicated to you at the time.
- **Object to processing** of your personal data where we rely on legitimate interests and there is something about your particular situation that makes you want to object to processing on this ground, as it impacts your fundamental rights and freedoms. You also have the right to object if we use your personal data for direct marketing purposes. In some cases, we may demonstrate compelling legitimate grounds that override your rights.
- **Request restriction of processing** in the following scenarios:
 - If you contest the accuracy of the data and we need to verify it.
 - If our processing is unlawful, but you do not want us to erase your data.
 - If we no longer need your data but you require it to establish, exercise, or defend legal claims.
 - If you have objected to processing but we need to confirm whether we have overriding legitimate grounds to continue.
- **Request the transfer** of your personal data to you or a third party. We will provide your data in a structured, commonly used, machine-readable format where technically feasible. This right applies only to automated data for which you initially provided consent or where we processed the data as part of a contract with you.
- **Withdraw consent** at any time where we rely on consent for data processing. This will not affect the lawfulness of any processing carried out before your withdrawal. If you withdraw consent, we may not be able to provide certain services to you. We will notify you if this applies at the time of your request.

Contact Information

For any questions regarding this privacy policy or to exercise your rights, please contact us at info@lumoraaccounting.co.uk