

Data Privacy Notice

We are committed to protecting your privacy and to complying with applicable data protection and privacy laws. This privacy notice tells you how we collect, use and protect your information when you visit our website, and your rights to your information. We will only use information we collect about you in accordance with this privacy notice.

This notice is effective from 17th August 2022 and may be updated from time to time.

This privacy policy supplements other privacy notices we might provide to you.

Who we are.

By “we”, “us”, “our” or “Lightricity” we mean Lightricity Limited, a company registered in England No. 10653159 at Edmund Halley Road, Oxford Science Park, Oxford OX4 4GB, UK.

Lightricity is a data controller; this means that we decide how your personal data is processed and for what purposes.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. Personal data does not include anonymous data, i.e. data where the identity has been removed. The processing of personal data is governed by the UK General Data Protection Regulation and other applicable data protection laws as enacted into UK law (the “GDPR”).

What data we collect and how

We may collect personal information that includes:

- Technical data: IP address, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our web site.
- Auditing data: Use of some website or app functions are logged to identify and isolate usage patterns and system problems
- Contact details: Your name and email address

We typically collect information in the following ways:

- If and when you provide information to us (e.g. through use of our website or product registration);
- From outside sources or third parties (e.g. Google Analytics).

How we protect your information

The security of your information is critically important to us. In order to protect your information, we have put in place physical, electronic and procedural safeguards. For example, these include:

- Ensuring that data sent between you and Lightricity is secured using industry-standard TLS (Transport Layer Security) encryption.
- Restricting access to your data to a limited number of senior personnel at a single location.

What we do with your data

We will only use personal information where we are allowed to by law. This will be under one or more of the following circumstances:

- To perform our contract we have or will have with you, either directly or via a third party
- To operate our web site and to deliver the products or services that you have requested
- It is necessary for us to run our business and to give you the best possible service
- To comply with a legal or regulatory obligation

We will always contact you in the way you have asked us to contact you.

For further detail on how we use your personal information please refer to this table:

Activity	Type of data	Legal basis
<ul style="list-style-type: none">• Deliver the products or services specified in our contract with you	<ul style="list-style-type: none">• Contact details	<ul style="list-style-type: none">• Performance of our contract with you, either directly or via a third party• Necessary for us to run our business: to monitor and maintain the performance of our services
<ul style="list-style-type: none">• Provide you with the information you requested	<ul style="list-style-type: none">• Contact details	<ul style="list-style-type: none">• Necessary for us to run our business: working out which of our products and services may interest you and telling you about them
<ul style="list-style-type: none">• Using data analytics to improve our website	<ul style="list-style-type: none">• Technical data• Auditing data	<ul style="list-style-type: none">• Necessary for us to run our business: to keep our website updated and relevant

Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Transferring your information overseas

Your personal information may be transferred and stored in countries outside the European Economic Area (EEA), including some that do not have laws that provide the same level of protection for personal information. When we do this, we will ensure it has an appropriate level of protection.

How long we keep your information

We will only retain your personal information for as long as necessary for the reason we have collected it, including for any contractual, legal or regulatory requirements we have to comply with. Generally, this means that we will have to store the information for at least 12 months.

In some circumstances we may retain your data for longer than 12 months. When determining how long to retain your personal data, we consider amount, nature, and sensitivity of the personal information; the potential risk of harm from unauthorised use or disclosure of your personal information; the purposes for which we process your personal information and whether we can achieve those purposes through other means; and any applicable legal and regulatory requirements.

In some circumstances we may anonymise your personal information, so that it can no longer be associated with you, and use this indefinitely without further notice.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Your rights

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data information:

- The right to request a copy of your personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for us to retain such data
- The right to withdraw your consent to the processing at any time, if consent is relied upon as a processing condition

- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to or restrict the processing of personal data in certain circumstances.
- The right to lodge a complaint with the Information Commissioners Office.

To exercise your rights in relation to your personal information, please email info@lighthousecity.co.uk

You are able to exercise your rights free of charge, but if you make unfounded, repetitive or excessive requests, we may charge you to carry these out or refuse to act on such requests.

We will try to respond to all requests within one month. If your request is complex or if you make lots of requests, we may extend our time to respond. If this is the case, we will let you know.

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated. If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office at <https://ico.org.uk>

How we use cookies on our web site

When you login to our website a cookie will be stored in your browser. This is used to authenticate who you are, including if you close your browser view and return at a later point. Settings you choose within our website may also be stored within your browser.

Measuring web traffic

When you visit our website we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. Click [here](#) if you would like to know more about Google Analytics.

Contact details

To exercise all relevant rights, for queries or if you have concerns or complaints please contact us in the first instance on info@lighthousecity.co.uk

Privacy Statement & Policy for the Lightricity App

The Lightricity App is a mobile application used to view the sensor data from Lightricity's BLE tags. It does so by listening to nearby Lightricity BLE tags.

Data that is collected by default includes:

- MAC address of nearby Lightricity BLE tags and other BLE devices
- Signal strength of BLE devices
- Advertisement data, which includes environmental data, from Lightricity BLE tags and other BLE devices
- Telemetry and reliability statistics: Firmware version, uptime, number of BLE devices listened to and debug information
- Current local time

In addition, the following usage data is collected anonymously for improving user experience:

- Crash reports, including debug information
- User engagement data: number of installs, uninstalls and active installations
- Number of sensors stored in the Lightricity App

The Lightricity App uses location data to scan for nearby BLE devices. Location data is stored on the user's mobile device only and can be erased by clearing the Lightricity App's data or by uninstalling it.

All stored data is processed in accordance with Lightricity's Data Privacy Notice above and also accessible via <https://lightricity.co.uk/data-privacy-notice>

Contact details

To exercise all relevant rights, for queries or if you have concerns or complaints please contact us in the first instance on info@lightricity.co.uk