

The processing of personal data is regulated by the Directive 95/46/EC (General Data Protection Regulation).

According to this Regulation:

personal data means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data. The controller shall take appropriate measures to provide any information relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form.

WHEN WE COLLECT INFORMATION, WHAT INFORMATION WE COLLECT, HOW WE COLLECT IT AND WHAT WE USE IT FOR

We collect information every time you interact with us. The type and quantity of information we collect and how we use it depends on why you are providing it.

WHEN WE COLLECT INFORMATION

There are many instances in which we may collect information about you. For example, we may collect information when you:

- Participate in an event.
- Subscribe to our e-newsletters, request information from us.
- When you visit our websites or social media pages via tools such as cookies and online identifiers (such as Google Analytics).
- Apply for a job with us.
- Contact us or become involved with us in any other way than as stated above.

Personal information submitted through the forms on this site is held only in a Lumina owned database. We promise that Lumina will not share the information you give to us on this website with any other organization outside of Lumina unless you have specifically given us permission to do so. Lumina does not collect any personal information about users, except that which is knowingly and specifically supplied to us by the user.

Lumina is committed to ensuring the privacy of your personal information.

We will not sell or pass on your information to any other organization outside of Lumina unless you specifically and expressly give us permission to do so.

We always give you the option to unsubscribe from our mailing lists.

WHAT INFORMATION WE COLLECT

The information we may collect from the above interactions may include, but is not limited to any of the following:

- Your name, email address, along with your preferences on topics, communications you want to receive and how we should contact you in the future.
- Information you enter onto our website.
- Images, photographs, or video if you take part in an event with us.
- Details of your visit to our websites, including technical information such as the (anonymized) IP address you use to access the website, your device, browser type and version.

The only instance in which we might collect sensitive categories of information is if you apply for a job with us.

HOW WE COLLECT INFORMATION ABOUT YOU

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

- Direct Interaction
- Automated technologies or interactions
- Third parties or publicly available sources

WHAT WE USE YOUR INFORMATION FOR

We use personal data for several different processing activities which includes:

- Providing you with the information you have requested.
- Keeping you up to date with the work we are doing and the latest EU news and campaigns.
- Keeping a record of your relationship with us.
- Managing your communication preferences, including marketing preferences.
- Understanding how we can improve our services, or information.
- Sending you marketing materials including events.
- Inviting you to events and to take part in campaigns and support our advocacy work.

OUR LEGAL BASIS FOR PROCESSING DATA

All our use of personal data is in accordance with the law. The law requires us to only process data where we have a valid legal basis for doing so.

You have the right to withdraw your consent to marketing at any time by contacting us or clicking the unsubscribe link in the email communication we send you.

Specific examples of processing activities under this legitimate interest include:

- Recording your communication and marketing preferences and maintaining suppression files so we do not contact you when you have asked us not to.
- Reviewing our database of audiences across the organization for historical, scientific and statistical purposes.

Operational administration such as:

- Recruiting and processing job applications.
- Keeping employee records and monitoring.

- Health and Safety.
- Management and planning purposes.

Financial management and controls such as:

- Processing supplier invoices.
- Administering grants for our programmatic work.
- Taking steps to prevent fraud and taking steps to ensure there is no misuse of services or money laundering.

If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please contact us.

WHAT WE COMMUNICATE WITH YOU ABOUT

We communicate with you about what you have asked us to – to provide the service you have requested.

WHO WE SHARE YOUR DATA WITH?

THIRD PARTIES FOR THEIR MARKETING

We do not sell or share personal details with third parties.

SERVICE PROVIDERS / SUPPLIERS

As with other organizations, we do not undertake all our processing activities ourselves and we appoint suppliers to help us out. For example, if we use a tool to send our newsletters. To do this, we need to share your personal data with them, so they know where to send it.

In this cases and others, we ensure that we have a contract with the supplier and as part of that agreement the supplier agrees to respect the security of your personal data and to treat it in accordance with the law. We only permit suppliers to process your personal data for specified purposes and in accordance with our instructions.

If you would like further information on our third-party processors, please contact us.

HOW WE KEEP YOUR DATA SAFE

We have appropriate physical, technical and managerial controls in place to protect your personal details. Within our offices only those who have a business need to access your information will have access to your information. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. Whilst we hope it will never happen, we have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are required to do so.

When we use external companies to collect or process personal data on our behalf, we undertake due diligence on these companies before we work with them and put a contract in place that sets out our expectations and requirements, including keeping and using your data securely.

Our website may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Despite all our precautions however, no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you disclose to us and you do so at your own risk.

HOW LONG WE KEEP YOUR DATA FOR

We will only keep your personal information for as long as is necessary for the purpose for which it is collected, which may include the purpose of satisfying any legal, accounting or reporting requirements. If you request that we stop sending you materials, we will keep a record of your contact details and the appropriate information to enable us to comply with your request not to be contacted by us.

RETENTION OF YOUR DATA

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 unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirements.

WHAT HAPPENS WHEN WE ANONYMISE OR DELETE YOUR DATA?

When we anonymize or delete your data, we will ensure that it is no longer identifiable to you.

HOW TO FIND OUT WHAT INFORMATION WE HAVE ABOUT YOU

You can request the details of the personal information we hold about you.

If you want to access your information, please contact us and send a description of the information you want to see and proof of your identity.

We will respond to you within two months of your legitimate request. You will not have to pay a fee to access your personal data however we reserve the right to charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT TO DO IF YOU DON'T WANT US TO PROCESS INFORMATION ABOUT YOU

If you don't want us to collect information about you as you browse our website, you'll need to set your browser to notify you when you receive a cookie, then choose to decline it.

WHAT TO DO IF YOU OBJECT TO OUR PROCESSING

If you object to any of the processing described in this privacy policy, then you have the right to object to that processing in certain cases.

We will need to keep a copy of your name, postcode and email address so that we can identify you on our suppression list to ensure we do not contact you any further or process your data in the way that you have objected to.

YOUR RIGHTS

Under data protection laws you have various rights over your personal data. If you would like to exercise any of these rights, then please contact us.

You have the right to:

- 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.
- You can request that we **correct the personal data we hold about you**. This enables you to have an incomplete or inaccurate data we hold about you corrected, although note that we may need to verify the accuracy of the new data you provide to us.
- You have the right to **ask us to erase your personal data** in certain circumstances. Please note however that there may be circumstances where you ask us to erase your personal data, but we are legally required or entitled to retain it.

Where we are processing your data under the legitimate interest condition, then you may object to this processing, or request that the processing is restricted, if there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Note that there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally required or entitled to continue processing your personal data and/or to refuse your request.

In some cases, we may demonstrate that we have a compelling legitimate ground to process your information which override your rights and freedoms.

WITHDRAW CONSENT

Where we have asked you for consent to process your data, you may withdraw this consent at any time by contacting us. Please note however that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.

CHANGES TO THIS POLICY

This policy was last updated in September 2021. We may amend or update this policy at any time to take account of any changes to data protection law or other legislation. When further updates to the policy are made, they will be posted on this page, so please check back here regularly.

CONTACT US

If you have any questions, please contact us.

GDPR outlines eight distinct rights that all Europeans are entitled to, which are:

1. The Right to Information
2. The Right of Access
3. The Right to Rectification
4. The Right to Erasure
5. The Right to Restriction of Processing
6. The Right to Data Portability
7. The Right to Object
8. The Right to Avoid Automated Decision-Making

You are entitled to access your personal data and rectify, block, or delete it if data are inaccurate or incomplete and to receive information on why and how your data is being processed.

WEB ANALYTICS

In order to better monitor the performance of this campaign action, we may use cookies with anonymized data to help improve your online experience. Our website uses Google Analytics to help us understand website traffic and web page usage and performance. We may collect anonymized IP addresses to better understand where our traffic is coming from. This helps us to get an insight in traffic patterns and know if there are problems with our website.

COOKIES

About web cookies

Web cookies are small snippets of text saved on your computer or mobile device that distinguish you from other users of a website. Like most websites, www.luminaconsult.eu uses cookies.

We use cookies for these purposes:

- To improve your experience of our website.
- Collect anonymous statistics.
- Website cookie acceptance.

By using our website, you consent to our use of cookies and the cookies we use will be stored on your device (unless rejected or disabled by your browser).

TURNING COOKIES OFF

Internet browsers normally accept some cookies by default. However, all modern browsers let you turn off either all or third-party cookies. If you do not accept our use of cookies as set out above, please set your browser to reject cookies. This may impair your ability to use our website. The option to do this is usually found in your browser's Options, Settings, or Preferences menu, depending on which browser you are using.