

GDPR Policy for Deal Packaging Business

1. Introduction

At Lifefix Ltd, we are committed to protecting the privacy and personal data of our investors. This GDPR (General Data Protection Regulation) policy outlines how we collect, process, store, and protect investor data in compliance with the requirements set forth by the Information Commissioner's Office (ICO) and the GDPR.

2. Data Collection and Processing

2.1. Lawful Basis for Data Processing

We will only collect and process investor data when we have a lawful basis to do so. This may include obtaining explicit consent from investors, fulfilling a contractual obligation, complying with legal obligations, protecting vital interests, performing tasks carried out in the public interest or in the exercise of official authority, or pursuing legitimate interests.

2.2. Data Minimization

We will only collect and process the necessary personal data required to carry out our business activities effectively. We will not collect excessive or irrelevant information.

2.3. Data Accuracy

We will take reasonable steps to ensure that the personal data we collect and process is accurate, complete, and up-to-date. Investors are responsible for promptly informing us of any changes or inaccuracies in their data.

2.4. Special Categories of Data

We will not collect or process any special categories of personal data, such as racial or ethnic origin, political opinions, religious beliefs, health information, or biometric data unless explicitly required or permitted by law.

2.5. Data Retention

We will retain investor data only for as long as necessary to fulfil the purposes for which it was collected, as required by law or legitimate business needs. We will regularly review our data retention practices to ensure compliance.

3. Investor Rights

3.1. Right to Information

Investors have the right to be informed about the collection and use of their personal data. This GDPR policy serves as a transparency measure, but we will also provide additional information upon request.

3.2. Right of Access

Investors have the right to access their personal data held by us. Upon request, we will provide a copy of the data in a structured, commonly used, and machine-readable format.

3.3. Right to Rectification

Investors have the right to request the rectification of inaccurate or incomplete personal data. We will promptly update any inaccuracies upon notification.

3.4. Right to Erasure

Investors have the right to request the erasure of their personal data under certain circumstances, such as when the data is no longer necessary for the purpose for which it was collected or if the processing is based solely on consent.

3.5. Right to Restriction of Processing

Investors have the right to request the restriction of processing their personal data in certain situations, such as when the accuracy of the data is contested or the processing is unlawful.

3.6. Right to Data Portability

Where applicable, investors have the right to receive their personal data in a structured, commonly used, and machine-readable format to transfer it to another data controller.

3.7. Right to Object

Investors have the right to object to the processing of their personal data based on legitimate interests or direct marketing purposes.

4. Data Security

4.1. Data Security Measures

We implement appropriate technical and organizational measures to ensure the security and confidentiality of investor data against unauthorized access, alteration, disclosure, or destruction.

4.2. Employee Training

Our employees undergo training on data protection, privacy, and GDPR compliance. They understand their responsibilities and obligations to protect investor data.

4.3. Third-Party Data Processors

If we engage any third-party data processors, we will ensure that they meet GDPR requirements and provide sufficient guarantees regarding the implementation of appropriate technical and organizational measures to protect investor data.

5. Data Breach Notification

In the event of a data breach that poses a risk to the rights and freedoms of investors, we will notify the ICO and affected investors within the timeframes specified by GDPR. We will also take appropriate measures to mitigate the impact of the breach and prevent future occurrences.

6. International Data Transfers

If we transfer investor data outside the European Economic Area (EEA), we will ensure that adequate safeguards, such as the use of standard contractual clauses or Privacy Shield certification, are in place to protect the data during the transfer.

7. Policy Review and Updates

We will review and update this GDPR policy periodically to ensure its continued relevance and compliance with applicable laws and regulations. Any material changes will be communicated to investors through appropriate means.

8. Contact Information

If investors have any questions, concerns, or requests related to their personal data or this GDPR policy, they can contact us at:

denise@lifefix.co.uk

By implementing this GDPR policy, we aim to protect the privacy and rights of our investors while ensuring compliance with the ICO requirements.