

Lamarnier Group Ltd - Privacy Policy

Last Updated: July 31, 2025

1. Introduction

Lamarnier Group Ltd ("Lamarnier Group," "we," "us," or "our") is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, store, share, and protect your personal data when you interact with our websites, products, services, and applications (collectively, "Services"). It also outlines your rights regarding your personal data and how you can exercise them.

We operate globally, and as such, our data processing activities are designed to comply with applicable data protection laws in the jurisdictions where we operate and where our users reside, including but not limited to:

- **General Data Protection Regulation (GDPR)** for individuals in the European Economic Area (EEA) and the UK.
- **California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA)** for California residents.
- **Lei Geral de Proteção de Dados (LGPD)** for individuals in Brazil.
- **Personal Information Protection and Electronic Documents Act (PIPEDA)** for individuals in Canada.
- **Personal Information Protection Law (PIPL)** for individuals in the People's Republic of China.
- Other relevant national and local data protection laws.

By using our Services, you agree to the collection and use of information in accordance with this Privacy Policy.

2. Who We Are (Data Controller)

Lamarnier Group Ltd is the data controller responsible for the processing of your personal data under this Privacy Policy.

Our Contact Details: Lamarnier Group Ltd, 85 Great Portland Street, London W1W 7LT, UK

Company Registration Number: 09571261

Email: support@lamarniergroup.com

Data Protection Officer (DPO) / Privacy Contact: support@lamarniergroup.com

For specific privacy concerns or to exercise your rights, please contact our Data Protection Officer/Privacy Team at: support@lamarniergroup.com

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person (a "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in

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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. This may include, but is not limited to, information relating to a household or device where applicable by law (e.g., CCPA/CPRA).

- **Processing:** 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.
- **Data Controller:** The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Data Processor:** A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
- **Consent:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **Services:** Refers to our websites, products, services, and applications offered by Lamarnier Group Ltd.
- **You:** The individual accessing or using the Services, or the company or other legal entity on behalf of which such individual is accessing or using the Services, as applicable.

4. Personal Data We Collect

We collect various types of personal data depending on your interaction with our Services. The types of data we collect may include:

- **Identity Data:** Name, username, date of birth, gender, marital status.
- **Contact Data:** Email address, postal address, telephone number.
- **Account Data:** Username, password, preferences, feedback, survey responses.
- **Financial Data:** Payment card details (processed by secure third-party payment processors), billing address, transaction history. We do not store full payment card details on our servers.
- **Technical Data:** Internet Protocol (IP) address, 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 our Services.
- **Usage Data:** Information about how you use our Services, products, and website, including Browse patterns, pages visited, time spent on pages, links clicked, and referral sources.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and our third parties, and your communication preferences.
- **Location Data:** General location derived from your IP address.
- **Sensitive Data (Special Categories of Personal Data):** We generally do not collect sensitive data (e.g., health, genetic, biometric data, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership) unless it is strictly necessary for the provision of a specific service you have requested or if required by law, and only with your explicit consent or where a lawful exemption applies. If we collect such data, we will inform you specifically and ensure enhanced protection measures are in place.

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- **Children's Data:** Our Services are not intended for children under the age of [e.g., 16 in GDPR regions, 13 in the US]. We do not knowingly collect personal data from children without parental consent. If we become aware that we have collected personal data from a child without verifiable parental consent, we will take steps to remove that information from our servers.

5. How We Collect Your Personal Data

We collect personal data through various methods:

- **Direct Interactions:** You may give us your identity, contact, 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:
 - Create an account with our Services.
 - Subscribe to our newsletters or marketing communications.
 - Purchase our products or services.
 - Participate in a survey, contest, or promotion.
 - Contact customer support.
 - Provide feedback.
- **Automated Technologies or Interactions:** As you interact with our Services, we may automatically collect Technical Data and Usage Data about your equipment, Browse actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Please see our Cookie Policy for more details.
- **Third Parties or Publicly Available Sources:** We may receive personal data about you from various third parties and public sources, such as:
 - Analytics providers (e.g., Google Analytics).
 - Advertising networks.
 - Payment and delivery services.
 - Publicly available sources (e.g., company registers, social media profiles where you have made your information public).
 - Data brokers or aggregators.

6. How We Use Your Personal Data (Purposes and Legal Bases)

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **To provide and manage our Services:**
 - To register you as a new user or customer.
 - To process and fulfill your orders, including managing payments, fees, and charges, and collecting and recovering money owed to us.
 - To deliver products and services you have requested.
 - *Legal Basis:* Performance of a contract with you or to take steps at your request before entering into a contract.
- **To manage our relationship with you:**
 - To notify you about changes to our terms or privacy policy.
 - To ask you to leave a review or take a survey.
 - To provide customer support and respond to your inquiries.

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- Legal Basis: Performance of a contract with you, compliance with a legal obligation, or our legitimate interests (e.g., keeping our records updated and studying how customers use our products/services).
- **For marketing and promotional purposes:**
 - To send you newsletters, promotions, and special offers if you have opted in to receive them.
 - To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
 - *Legal Basis:* Your consent (where required by law, e.g., for direct marketing emails) or our legitimate interests (e.g., for direct marketing to existing customers where permissible, or to develop our products/services and grow our business). You have the right to withdraw consent to marketing at any time.
- **To improve our Services and business:**
 - To administer and protect our business and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data).
 - To use data analytics to improve our website, products/services, marketing, customer relationships, and experiences.
 - *Legal Basis:* Our legitimate interests (e.g., for running our business, provision of administration and IT services, network security, preventing fraud, and in the context of a business reorganisation or group restructuring exercise).
- **For security and fraud prevention:**
 - To detect, prevent, and address technical issues, fraud, or security incidents.
 - To protect the rights, property, or safety of Lamarnier Group, our users, or the public as required or permitted by law.
 - *Legal Basis:* Compliance with a legal obligation or our legitimate interests (e.g., to ensure the security of our systems and services).
- **To comply with legal obligations:**
 - To comply with applicable laws, regulations, legal processes, or governmental requests.
 - To establish, exercise, or defend legal claims.
 - *Legal Basis:* Compliance with a legal obligation.

Lawful Basis Explanation (GDPR/LGPD focus):

We process your personal data based on one or more of the following lawful bases:

- **Consent:** Where you have given us clear consent for specific processing purposes. You have the right to withdraw your consent at any time.
- **Contractual Necessity:** Where processing is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legal Obligation:** Where processing is necessary for compliance with a legal obligation to which we are subject.
- **Legitimate Interests:** Where processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms. We ensure a balance between our legitimate interests and your rights.
- **Vital Interests:** Where processing is necessary to protect your vital interests or those of another natural person.

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- **Public Task:** Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

7. How We Share Your Personal Data

We may share your personal data with the following categories of recipients:

- **Internal Third Parties:** Other companies within the Lamarnier Group corporate family, acting as processors or controllers, who provide IT and system administration services and undertake leadership reporting.
- **External Third Parties (Service Providers):** Trusted third-party service providers who perform services on our behalf, such as:
 - Payment processors (e.g., Stripe, PayPal).
 - Website hosting and maintenance providers.
 - Email service providers and marketing platforms.
 - Analytics providers (e.g., Google Analytics).
 - Customer support platforms.
 - Professional advisors (e.g., lawyers, accountants, auditors).
 - Shipping and logistics providers.

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 our third-party service providers 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.

- **Third Parties for Marketing (where applicable):** With your explicit consent, we may share your data with third parties for their direct marketing purposes.
- **Business Transfers:** In the event of a merger, acquisition, reorganisation, sale of assets, or bankruptcy, your personal data may be transferred to a third party involved in such a transaction. We will notify you of any such transfer and any changes to this Privacy Policy.
- **Legal and Law Enforcement:** We may disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency), or to protect our rights, property, or safety, or the rights, property, or safety of others.

We do not sell your personal data to third parties for monetary consideration. However, under the CCPA/CPRA, certain sharing of personal information for cross-context behavioural advertising may be considered a "sale" or "sharing." Please refer to Section 9 (Your Rights) for details on how to opt-out of such activities if you are a California resident.

8. International Data Transfers

As a global company, your personal data may be transferred to, and stored at, a destination outside of your country of residence or the country from which the data was collected, including countries outside the European Economic Area (EEA), UK, Brazil, Canada, or China, where data protection laws may differ.

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When we transfer your personal data internationally, we take appropriate safeguards to ensure that your personal data receives an adequate level of protection, in accordance with applicable data protection laws. These safeguards may include:

- **Standard Contractual Clauses (SCCs):** Implementing SCCs approved by the European Commission, the UK Information Commissioner's Office, or other relevant authorities.
- **Adequacy Decisions:** Transferring data to countries or organisations that have been deemed to provide an adequate level of data protection by the European Commission, the UK, or other relevant authorities.
- **Binding Corporate Rules (BCRs):** For intra-group transfers within Lamarnier Group, if applicable.
- **Your Explicit Consent:** In specific situations, if no other legal basis for transfer exists, we may rely on your explicit consent for the transfer after having informed you of the possible risks of such transfers.

For more information on our international data transfer mechanisms, please contact us using the details in Section 2.

9. Your Data Protection Rights

Depending on your location and the applicable data protection laws, you may have the following rights regarding your personal data:

- **Right to be Informed:** The right to be informed about how your personal data is collected and used (this Privacy Policy serves this purpose).
- **Right of Access:** The right to request access to the personal data we hold about you and to receive a copy of that data.
- **Right to Rectification:** The right to request that we correct any inaccurate or incomplete personal data we hold about you.
- **Right to Erasure ("Right to be Forgotten"):** The right to request that we delete your personal data under certain conditions (e.g., when the data is no longer necessary for the purposes for which it was collected).
- **Right to Restrict Processing:** The right to request that we restrict the processing of your personal data under certain conditions (e.g., if you contest the accuracy of the data, for a period enabling us to verify its accuracy).
- **Right to Data Portability:** The right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller, where technically feasible.
- **Right to Object:** The right to object to the processing of your personal data under certain conditions, particularly if the processing is based on legitimate interests or for direct marketing purposes.
- **Rights in Relation to Automated Decision-Making and Profiling:** The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless certain exceptions apply.
- **Right to Withdraw Consent:** Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

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Specific Rights for California Residents (CCPA/CPRA):

If you are a California resident, you have additional rights:

- **Right to Know:** The right to request that we disclose what personal information we collect, use, disclose, and sell/share.
- **Right to Opt-Out of Sale/Sharing:** The right to opt-out of the "sale" or "sharing" of your personal information (as defined by CCPA/CPRA, which includes sharing for cross-context behavioural advertising).
- **Right to Limit Use and Disclosure of Sensitive Personal Information:** The right to limit our use and disclosure of sensitive personal information to that necessary to perform the services or provide the goods reasonably expected by an average consumer.
- **Right to Deletion:** The right to request the deletion of your personal information, subject to certain exceptions.
- **Right to Correction:** The right to request the correction of inaccurate personal information.
- **Right to Non-Discrimination:** The right not to receive discriminatory treatment for exercising your privacy rights.

Exercising Your Rights:

To exercise any of these rights, please contact our Data Protection Officer/Privacy Team using the contact details provided in Section 2. We may 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 any 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.

We will endeavour to respond to all legitimate requests within the timeframes required by applicable law (e.g., 30 days for GDPR, 45 days for CCPA/CPRA, 15 days for LGPD). Occasionally, it may take us longer 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. Data Security

We have implemented appropriate technical and organizational security measures designed to protect your personal data from accidental loss, unauthorised access, use, alteration, or disclosure. These measures include:

- Encryption of data in transit and at rest where appropriate.
- Access controls and authentication procedures for our systems.
- Regular security assessments and vulnerability testing.
- Employee training on data protection and security best practices.
- Incident response plans to address potential data breaches.

While we strive to protect your personal data, no method of transmission over the Internet or method of electronic storage is 100% secure. We cannot guarantee the absolute security of your personal data.

11. Data Retention

We will retain your personal data only for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

12. Cookies and Tracking Technologies

Our Services use cookies and similar tracking technologies to enhance your experience, analyse usage, and for marketing purposes. Cookies are small data files placed on your device.

We use different types of cookies:

- **Strictly Necessary Cookies:** Essential for the operation of our Services.
- **Analytical/Performance Cookies:** Help us understand how visitors interact with our Services, identify areas for improvement.
- **Functionality Cookies:** Allow our Services to remember choices you make and provide enhanced, more personal features.
- **Targeting/Advertising Cookies:** Used to deliver advertisements relevant to you and your interests.

You have the option to accept or refuse cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Please note that disabling cookies may affect the functionality and your experience of our Services.

13. Third-Party Links

Our Services may contain links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Services, we encourage you to read the privacy policy of every website you visit.

14. Changes to This Privacy Policy

We may update our Privacy Policy from time to time to reflect changes in our practices, legal requirements, or technological advancements. We will notify you of any material changes by posting the new Privacy Policy on this page and updating the "Last Updated" date at the top. We may also notify you through other means, such as email, where appropriate.

We encourage you to review this Privacy Policy periodically for any changes.

15. Contact Us

If you have any questions about this Privacy Policy, our data practices, or if you wish to exercise any of your rights, please contact us:

By email: support@lamarniergroup.com

By post: Lamarnier Group Ltd, 85 Great Portland Street, London W1W 7LT, UK