



**Lucidity Solutions**

Creative · Challenging · Clear

## Data Protection and Privacy Policy

### Introduction

Lucidity Solutions Ltd is serious about protecting your privacy and maintaining the security of any personal information collected or received from you. When you submit information to us, this is kept confidential and used to support our activities. The [General Data Protection Regulation \(GDPR\)](#) and the [Data Protection Act \(DPA\) 2018](#) in the UK set out the rules for processing personal data. This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by Lucidity Solutions. We are committed to processing data lawfully, fairly and transparently, to retain data only until it is necessary, and to protect it from unauthorised use.

### Personal data

Personal data only includes information relating to natural persons who: can be identified or who are identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information. Personal data may also include special categories of personal data or criminal conviction and offences data. This is sensitive data and should be dealt with differently. We do not collect this type of data.

### Principles

Lucidity Solutions Ltd is an ethical consultancy. We are committed to openness and honesty in all our activities. We collect and store personal data only when it is necessary to provide consultancy services to clients. We seek to obtain informed consent from individuals involved before collecting personal information. For other activities, such as recruitment, business development, marketing and human resource management, we collect personal data necessary to conduct and grow our business and to fulfil our legal obligations. All personal information we gather for activities other than projects is held only after seeking consent (verbal or written, based on the situation) from the data owner.

### Activities when we collect personal data

We carry out a range of activities where we might collect personal data:

#### Interviews:

We conduct interviews in person and by telephone, email, or videoconferencing software (such as Zoom). In all such cases, we ask interview participants to identify themselves, state the purpose of the interaction, and whether notes will be taken during the interview. If we are recording the interview, which happens very rarely, we will notify participants and ask for verbal consent. We usually take notes of pertinent issues from any interviews, rather than making

transcripts. If we make transcripts, we will obtain prior consent. Interviewees have the option to remain anonymous in any report or other project output. Prior to undertaking interviews, we will send information about the project. This will usually contain list of questions and any specific terms and conditions for the interaction. We destroy notes and any recordings within two years of the completion of the project. We will only ever share summaries of these conversations.

### **Surveys:**

All surveys created and/ or managed by us will be identifiable by our company logo, name and contact details. Our surveys will clearly explain the purpose of the project and how the information will be used (e.g., to inform a report). Surveys created and/or managed by Lucidity Solutions never require you to enter your personal details (such as your name or email address). You may have the option to enter these voluntarily. In all cases where you do not voluntarily provide your personal data, we will only have access to the IP address of the computer you used to complete the survey.

### **Feedback:**

All client feedback provided will be treated in confidence. We will only use testimonials for marketing purposes where this purpose has been made clear.

### **What we collect**

When collect information on behalf of a client project, to develop strategies, enhance services or processes, evaluate activities or produce reports or other outputs. If the project calls for it, we will ask for opinions. Project participants can refuse to answer any questions and we will only link an opinion to an individual if we have gained consent.

For most projects, we may collect and process the following information about participants:

- Contact details (normally including name, email address, telephone number, organisation, and job title).
- The data submitted when expressing opinions, attitudes, experiences and perceptions.

Our website uses web analytics (Google Analytics), however, it only collects anonymised statistical data that does not allow the identification of any individual.

### **How we use the information**

Projects we work on often involve collecting both qualitative and quantitative information, such as notes from interviews or survey responses or data provided by our clients on different activities. We analyse this information to inform recommendations and other outputs from the project. We do not use the information to identify individuals.

We use the findings to inform reports we prepare for our clients. Information is analysed at an aggregate level and provided anonymously. If we have to share personal information with the client, you will have the right to withdraw your consent to data sharing and processing.

## Obtaining consent

Before asking you to share personally identifiable information, we will ask for your consent. In the case of interviews, consent will be sought verbally, and this will be logged in our notes. In surveys, consent will be sought via the questionnaire, and the survey itself will outline why we seek to obtain personally identifiable information, what information we collect and what we will do with the data. You may withdraw your consent or restrict data processing at a later stage by contacting us here [info@luciditysolutions.co.uk](mailto:info@luciditysolutions.co.uk).

## Unsolicited emails and opt out

We might get in touch with you to ask you to take part in a project. When we do this, we are acting on a strong belief that could you contribute to that project, normally following a recommendation from our client. Participation in projects is always optional and voluntary. Should you wish to opt out of the project, you can do so by letting us know.

We may also get in touch with you as a potential customer where we believe we are offering a service that you may find useful. To comply with the new GDPR regulation, we state clearly why we are contacting you and provide an opt out option.

## Sharing information

We will not share personal information with any third-party organisation, unless we are obliged to do so by contract, by law, or the disclosure is 'necessary' for purposes of national security, taxation and criminal investigation, or we have your consent.

## Data storage, security and retention

Lucidity Solutions Ltd stores, shares or transfers information using Dropbox, which offers advanced security features as discussed on [this page](#). Access is password protected. Information we collect through surveys is generally stored on cloud servers managed by our survey software provider, SurveyMonkey. Access is password protected. Our survey software provider is responsible for preventing data breaches by maintaining and updating the security of their IT system.

Lucidity Solutions Ltd will not keep personal data longer than necessary to fulfil its legal or contractual obligations. This means that, unless otherwise indicated when seeking consent from project participants, we will delete personal data no later than 24 months after the conclusion of a project.

## Employees and job applications

When applying for an open position at Lucidity Solutions, we will process your information in ways that would be reasonably expected. All CVs will be deleted within 30 days from the end of the hiring period. Should we wish to keep your CV for future job opportunities, we will you're your consent via email. Whether you are an employee or job applicant, you have the following

rights with respect to your personal data: access, rectification, erasure, withdrawal of consent, objection to processing and lodging of complaints to supervisory authority.

Employee data will be kept for a period of six years after cessation of employment, unless otherwise requested by the employee. Ex-employee data will be periodically reviewed and deleted when appropriate.

### Other websites

The content we publish on our company website blog may contain links to other websites that are outside our control and are not covered by this Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

### Data Protection Officer

Lucidity Solutions does not have a data protection officer. Article 37 of the GDPR details the cases where one is needed, and Lucidity Solutions does not fit within any of the cases mentioned: we do not carry out systematic monitoring of data subjects nor do we process special categories of personal data. We are registered with the [Information Commissioner's Office](#), under reference number ZB110215.

### Your legal rights

When you participate in our projects, you have a legal right under the GDPR to request access to any information that we hold that can be identified as yours (right to information and access). This request should be put in writing to the details below:

Lucidity Solutions Ltd  
East Steading, Cashley Farm, Buchlyvie  
Stirling, FK8 3PA

We will respond within 30 days of receiving your request. The GDPR details a number of exemptions from disclosure and, should we be unable to fulfil your request, we will provide a full explanation in writing.

You have a right to data portability. Therefore, when providing data to you, we will do so in a commonly-used and machine-readable format (e.g. a csv spreadsheet). You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [info@luciditysolutions.co.uk](mailto:info@luciditysolutions.co.uk). The GDPR also gives you the right to erase your data and/or restrict its processing. Please get in touch at [info@luciditysolutions.co.uk](mailto:info@luciditysolutions.co.uk) should you wish to exercise these rights.