PRIVACY POLICY

Data Protection and Information Security

Lime Blue Solutions Ltd services bring us into contact with personal information about people. To ensure that all those using and working in the company can do so with confidence, we adhere to the Data Protection Act 1998 and subsequent GDPR regulations of May 2018.

This document helps to ensure that we have followed the agreed company procedures, which regulate when and how an individual's "personal data" may be obtained, used, disclosed and generally processed. It applies to computerised processing of personal data and paper- based files and records.

To comply with the law, information is collected and used fairly, stored securely and not disclosed to any other person unlawfully. To do this, Lime Blue Solutions Limited staff comply with the Data Protection principles and subsequent GDPR regulations. In summary, these state that personal data shall be:-

- Processed fairly, lawfully and in a transparent manner
- Obtained for specified, explicit and legitimate purpose and not further processed
- Adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is deemed necessary for the specific purpose
- Processed in accordance with the data subject's rights
- Protected by appropriate security
- Not transferred to a third country or an international organisation if the provisions of the GDPR are not complied with (under the 8th principal we can transfer information for travel & event purposes to a third party overseas providing we have the individuals consent)

This privacy policy covers the following points:

- What kind of information do we collect; the ways we collect it and why
- How we use information we collect
- With whom we share information we collect
- How you can access, amend, and delete information we collect from you
- What kinds of security we use to protect information you provide.

Before using the Lime Blue Solutions Limited website or communicating with us – and particularly before providing personally identifiable information to us – you should read this entire policy. Use of our website or communicating with us constitutes your agreement to the terms of this policy. If the terms of this policy are not acceptable to you, do not provide any personally identifiable information to us. You can also contact us at accounts@limebluesolutions.com

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T: 01628 780211 e:accounts@limebluesolutions.com www.limebluesolutions.com

HOW WE COLLECT INFORMATION

We collect information from you in two ways: actively and passively. Active information collection refers to instances in which we gather information from you when you fill it in and send it to us, such as by completing a contact form on our website, event registration site or signing up for our electronic newsletter. Active information includes both personally identifiable information (e.g., your full name or information that is unique to you). Passive information collection refers to instances in which we collect information from you that you have not actively provided (please see the next section of this policy for a summary of our passive information collection methods).

TYPES OF ACTIVE INFORMATION COLLECTION:

(a) Website Contact Form
If you wish to get in contact to find out more about our services, we ask you to complete a contact form that asks for the following information: full name, email address, company name, telephone number, job title and any optional details you wish to disclose about your enquiry.

(b) Sign up to our online and offline newsletters via our website
When you submit your request to receive our electronic and paper newsletters we ask for your email address, work postal address and you will also be asked to tick a box if you would like to opt in to receive relevant marketing communications and company updates from us.

(c) If you are attending a Lime Blue Solutions Ltd event and are required to register via a registration site, we will ask for the following information: full name, email address, job title, company name, telephone number, dietary requirements. (For client registration sites, please refer to section called 'DATA PROCESSING ON BEHALF OF CLIENTS').

TYPES OF PASSIVE INFORMATION COLLECTION:

Personal information will also be collected automatically via our website which we own and operate: www.limebluesolutions.com, as well as any online registration systems and websites we create for client events:

(a) Cookies and IP addresses

Our website and event registration sites are created using a third-party supplier called EventsCase. The development software uses several third-party tracking services that use cookies, IP addresses, location, browser and operating system data to track non-personally identifiable information about visitors to the Site in the aggregate like Google Analytics or Zopim. We have no access or control of these third-party tracking utilities.

The sites sometimes link the information we store in cookies to any Personally Identifiable Information you submit while on a Site in order to improve the Site and to deliver a better and more personalised service.

The Sites use both session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate a Site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

We set a persistent cookie to remember your login details (for registration sites only), so you don't have to enter it more than once. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on our Site.

You may refuse to accept cookies by activating the settings on your browser which allows you to refuse the setting of cookies. However, if you select this setting your ability to access certain areas of our Site may be limited. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Site.

(b) Personal data storage and security

Our third-party internet provider stores data at Amazon Ireland, always inside of the European Union.

The AWS environment that hosts our third-party services maintains multiple certifications for its data centres, including ISO 27001 compliance, PCI Certification, and SOC reports. For more information about their certification and compliance, please visit the AWS security website (https://aws.amazon.com/security/) and the AWS compliance website (https://aws.amazon.com/compliance/).

Customer data is encrypted at rest (AWS RDS Encryption - AES-256).

HOW WE COLLECT INFORMATION THROUGH OTHER CHANNELS

We collect information from you when you call us, when you send emails, when we meet with you in person and when you communicate with us via social media.

HOW DO WE USE THE INFORMATION

The data we process about you, will only be used and disclosed in accordance with this policy or as specifically disclosed to you at the time you provide the information.

We will process it in the following ways:

(a) To respond to your requests, it will be accessed by our internal staff, service providers who act on our behalf, and carefully selected third parties in the course of providing quotes that you request for our services and fulfilling your event and marketing enquiries (e.g. for quotes, travel,

Lime Blue Solutions 3b Pinkneys Farm, Furze Platt Road, Maidenhead, Berkshire, SL6 6PZ
T: 01628 780211 e:accounts@limebluesolutions.com www.limebluesolutions.com

airlines, accommodation providers, destination management companies, printers, videographers, photographers, marketing agencies and other production companies for operational purposes.)

(b) Should you opt in to receive our electronic and paper newsletters, company and services updates and relevant marketing news, or if you have previously asked us for a quote or confirmed an event or design project with us. We will send you these to the email or postal address you have provided to us. You can unsubscribe any time – see section called 'Unsubscribing' for more information.

UNSUBSCRIBING
On all of our marketing communications to you we will include a clearly and prominently displayed way for you to unsubscribe from any future communications.

Should you wish to unsubscribe from marketing communications via email, you may opt out by sending an email to zoe@limebluesolutions.com writing 'unsubscribe' in the title or replying to a specific email campaign by replying to the email communication and writing 'unsubscribe' in the title.

Should you wish to unsubscribe from marketing communications via postal mail, you can contact us by e-mail at zoe@limebluesolutions.com (please write "unsubscribe" in the subject line and provide each postal address you would like us to remove), or by post at Lime Blue Solutions Ltd, 3b Pinkneys Farm, Furze Platt Road, Maidenhead, Berkshire, SL6 6PZ.

ACCESS TO YOUR PERSONAL DATA
We provide you with reasonable access to your personal information to correct errors or delete the information you have provided. If you wish to correct or delete your personally identifiable information, please contact us by e-mail at zoe@limebluesolutions.com or by post at Lime Blue Solutions Ltd, 3b Pinkneys Farm, Furze Platt Road, Maidenhead, Berkshire, SL6 6PZ.

DATA PROCESSING ON BEHALF OF A CLIENT
We process data for clients to fulfil our contractual responsibilities either in the course of sourcing a venue, managing their event or delivering their design and marketing projects.

VENUE SOURCING PURPOSES

VENUE SOURCING

When venue sourcing for a client, we will keep emails from clients, venue proposals and venue confirmations. Once the event has taken place and commission invoices paid, all invoices will be kept by our accounts department and event information on the server, but no other paper files will be kept.

EVENT MANAGEMENT

- All Lime Blue Solutions Limited contracts will include terms and conditions adhering to the GDPR regulations and therefore information given to us by clients can be processed for the purposes of the contract or SLA. When a client supplies us with delegate details we will not require individual consent to pass delegate data to third parties and sub data processors (i.e. destination management companies, flight companies etc) but will require the client to **confirm** they have already received this consent from their delegates. We ensure that within client contracts and SLA agreements the client has confirmed the following sentence "the data controller has taken all reasonable steps to make data passed to us compliant under GDPR regulations and all applicable laws".

- When compiling registration websites, and further information is required from delegates, we set up a fair processing notice on the registration site, which will be different for every client.

- When clients send us personal information on their delegates we ensure these spreadsheets have been password protected. Passwords are sent to us separately – preferably by text or phone call.

- We ensure all documents we create in the process of the event which contain delegate information are password protected. We use GDPR compliant password protocol. Only individuals working on an event, the Company Directors, Senior Account Directors and the Lime Blue Solutions Limited Data Protection Manager will have access to these passwords (which they need for crisis management purposes).

- Prior to travelling to an event – we make sure all delegate data is only put onto encrypted memory sticks.

- Prior to returning from an event – any documents that have been put on a desktop during the event are deleted from desktops before travel.

- After each event, relevant documents such as signed contracts and signed SLA's are stored in paper form in an annual archive box and kept for a period of six years.

- All medium to high risk personal information (such as date of birth, postal address, passport information etc.) gathered for a specific event is shredded on-site at our offices and deleted from all computers, servers and memory sticks post event and on completion of all invoicing and subsequent payment.

- We delete all emails that contain personal information from any staff inboxes, sent items, files and deleted folder.

Lime Blue Solutions 3b Pinkneys Farm, Furze Platt Road, Maidenhead, Berkshire, SL6 6PZ
T: 01628 780211 e:accounts@limebluesolutions.com www.limebluesolutions.com

- All client and supplier paper invoices will be kept by the Lime Blue Solutions Limited Accounts Department for a period of six years.

- All other personally identifiable information deemed as low risk which is held on individuals as part of the event (i.e. registration names, event planners), shall be kept on our H: drive in password protected files for a maximum of 5 years, after which they will be deleted if we are no longer working with that client.

- Client registration website pages are deleted and the websites set to 'unpublished' within 2 weeks past the last day of the event. We keep a record of the number of registrations only.

    - If an App has been used – we request external supplier to remove it from the App Store within 2 weeks of returning from the event

DESIGN AND MARKETING

Any design files that contain any personally identifiable information will be kept in a password protected folder. Only the Company Directors, Senior Account Directors and the Lime Blue Solutions Limited Data Protection Manager will have access to these passwords.

DATA PROTECTION OFFICER

Lime Blue Solutions Ltd has not appointed a data protection officer as it is our policy **NOT** to collect the following information:

Racial or ethnic origin or political opinions
Religious or philosophical beliefs
Trade union membership
Genetic data, or biometric data,
Data concerning health
Data concerning a natural person's sex life or sexual orientation.

We have a Data Protection Manager who can be contacted at +44 1628 780211 or accounts@limebluesolutions.com

LIME BLUE SOLUTIONS PROPRIETARY DATABASE

Throughout the course of our business, we collect data on 3 different types of contacts:

- Prospects
- Clients
- Suppliers

All contacts have the right to ask what information we hold on them on this database.

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PROSPECTS
We collect and store information on prospective clients who we believe may have a legitimate business interest in our services. This is usually collected via marketing campaigns, networking events or cold calling.

We collect and store their name, job title, company name, company address, phone number, business mobile, email address and website and a record of conversations we have had with them.

We may also keep a record of what marketing activity we have had with them.

These records are kept for a period of 3 years. If we have had no engagement with the prospect within this time; they are contacted a final time and if no response the record is deleted.

Prospect marketing communications must always contain the option to unsubscribe.

CLIENTS
The above information is also collected from any clients that call or email the Lime Blue Solutions Limited with a new enquiry. We also keep a record of what enquiries they have made with us, venues we have booked on their behalf, events or design projects we have delivered for them and any feedback.

This information is kept for 5 years. If we have had no engagement with the client within this time; they are contacted a final time and if no response the record is deleted.

All client marketing communications must contain the option to unsubscribe.

SUPPLIERS
The above information is also collected from suppliers for use to facilitate work/projects. This information is kept on the ACT database indefinitely unless requested to be removed.

LOSS OF LAPTOP - PROCEDURE

In the unfortunate event that a company laptop is lost or stolen, the following procedures are followed:

- A line manager, Company Director or data protection manager is immediately notified - where and when the loss occurred. They will in turn inform the necessary other parties.
- Our IT provider is requested to change the username and password.
- Passwords are changed via phone or other means.
- Lost and found departments are checked if applicable.

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- If stolen, the loss is reported to the police to obtain a crime reference number for insurance purposes. All company laptop serial numbers are kept on record in our Business Continuity Policy for easy access.

- The line manager makes the client aware that the laptop has been lost and then explains what precautions have already been taken to protect their data.

GENERAL DATA STORAGE AND SECURITY INFORMATION

At the end of employment (or contract), personnel access to computing and network resources, facilities and secure areas are immediately terminated.

Entry to the Lime Blue Solutions physical office is protected via a locked door with an additional security measure by way of a code pad entry system. Each time an employee terminates their employment, the door key is returned and the access code is changed.

The office premises is alarmed and has a connection to the police. In the event of the alarm sounding the Directors and the Data Processing Manager are notified (in that order) – who then respond and investigate the alarm.

Lime Blue Solutions holds an inventory of assets in the Business Continuity Policy, a copy of which is kept both onsite and offsite. It documents ID/ ownership/ usage/ location and configuration. Our data centre (server) and telecommunications closet is located in an open plan office so no unauthorised access can occur during office hours. This is further protected by a code pad. We also keep a log of personnel entering the cupboard.

We do not currently have the facility to protect our equipment within our server room from electricity failure outages and surges – however regular back-ups are made.

Our data is backed up 3 times per day onto Cloud storage and data backup and recovery events are logged by our IT provider. Our Office 365 data is all stored within UK and our files and folders are all backed up to Azure, which is within the UK (London).

Backup discs are kept in a secure, onsite location. At the end of each week day a backup is taken and the disc taken offsite. Discs are encrypted.

Our IT provider holds network configuration blueprint of the infrastructure and maintains documentation of configuration changes to each system. They also have formally defined policies and practices for performing risk assessments of software and systems.

Our laptop, desktop and servers have properly configured anti malware software – Bit Defender.

Desktops and laptops all have Windows Firewall which deny access to all connections that are not explicitly allowed.

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Our IT provider gives us original passwords for each desktop and laptop and the operator then changes the password. Password policy enforces a change every 3 months. All passwords set use a minimum of 9 characters with 4 complexity classes – at least 1 is upper case, 1 is lower case, 1 is a number and 1 is a symbol. The same individual password can never be reused. Discs from old computers are removed, wiped and disposed of via Purple Jelly, Lime Blue's dedicated IT company.

Any further details you may require on how our systems are protected can be obtained from Purple Jelly on 01252 856230

This policy was last updated in May 2018

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