



**PRIVACY POLICY
COMPANY NUMBER:**

12783409

SEVENTY-NINTH™ GROUP

Privacy Policy – The 79th GRP Limited (Company number: 12783409)

Who we are. The 79th GRP Limited (**We**) are committed to protecting and respecting your privacy.
How to contact us. You can contact us by writing to us at 804 Merlin Park, Ringtail Road, Burscough, Lancashire, L40 8JY or info@the79thgroup.co.uk, or by phoning us on +44 (0) 151 316 0392.
Data Protection Officer. Our Data Protection Officer is Curtis Webster.
About this policy. 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 us when:

- (i) Emailing any of our company email addresses,
- (ii) If you provide us with any further data,

It also provides information about the various rights you have in respect of the personal data we hold about you and how to exercise these.

By using the Website and/or any of our services you are accepting our use of your personal data in this way.

What personal data do we hold about you?

When you email us at any of our 79th GRP domain emails. We will collect your name, email address, any other personal data you share via these emails.

- Name, e-mail address, and phone number provided.
- Any other personal data provided.

Do we store payment details?

No, we do not store any payment details as there is no facility for payment transactions take place. How do we use the personal data we hold about you and what lawful basis do we rely on for doing so? Where you or your business have emailed any of our domain emails. We use your personal data for the purpose of replying to any such emails, Our lawful basis for using your personal data is legitimate interests (being those reasons specified).

Sharing your personal data.

The only third party hosting service we use is our email host provider (currently Google mail). If you are a user within the European Economic Area (EEA), we will not transfer your data outside of the EEA.

Required disclosures to third parties.

We may make the following disclosures of your personal information to third parties where required:

- (i) In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- (ii) If The 79th GRP Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its users may be one of the transferred assets.
- (i) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of The 79th GRP Limited, our clients or users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data.

Your data will be stored by our third party hosting service, Google Drive in Dublin, Republic of Ireland. Where you are a resident in the EEA, we will not transfer any personal data we collect from you to a destination outside the European Economic Area.

How we will protect your data.

All personal data you provide to us is stored on our secure servers, hosted by Google Drive (based in the Republic of Ireland) , which has in place network and web application firewalls, encryption in transit, monitoring tools and access controls. These security measures are monitored and may be updated from time to time.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted by emailing and of our domain emails; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we will store your personal data.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Our retention periods will depend on why we are holding your personal data.

- (i) For the purpose of fulfilling our contracted services:
Individual Users: We will retain your personal data for 24 months post cessation of our contracted services;
- (ii) For the purpose of technical analysis: When using any of our contracted services, we will retain Technical and Usage Data for three months following collection.

We may delete your personal data earlier than this if the engagement is terminated. We may also retain your personal data for a longer period in the event of a complaint or contemplation of legal proceedings.

You have various rights in respect of your personal data.

You have various rights in respect of your personal data, as follows:

- (i) a right of access to a copy of the personal data we hold about you;
- (ii) a right to object or restrict processing that is likely to cause or is causing damage or distress to you, and a right to restrict;
- (iii) a right to object to decisions being taken by automated means;
- (iv) a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed;
- (v) a right to request a transfer of your personal data;
- (vi) a right to withdraw consent at any time; and
- (vii) a right to claim compensation for damages caused by a breach of the Act.

If you wish to exercise any of these rights, please contact us at info@the79thgroup.co.uk, or by phone on +44 (0) 151 316 0392.

We may make changes to our privacy policy. Any changes we make to our privacy policy in the future will be notified to you the first time you use the Software following such change, and this policy will be available to you on the Website.

Your right to make a complaint in respect of our use of your personal data. You have the right to complain in respect of our use of your personal data. If you are a UK resident, your complaint would normally be addressed to the Information Commissioner's Office. Please contact us before you escalate your complaint.

You can contact us in respect of your personal data. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to The 79th GRP Limited, whose registered offices are situated at Heritage House, 9b Hoghton Street, Southport, England, PR9 0TE or info@the79thgroup.co.uk.



ESTABLISH MORE, **TOGETHER.**

SEVENTY-NINTH™ GROUP

www.the79thgroup.co.uk

info@the79thgroup.co.uk

Private and Confidential

UK OFFICE

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JAPAN OFFICE (TOKYO)

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Kojimachi, Chiyoda-KU
Tokyo, Japan.

Powered by The 79th GRP Limited, which includes 79th Luxury Living One Limited and Lusso Tesoro Limited. We are not currently associated with any other companies who may have a similar name, branding or logo. Please do contact us should you require any further clarification.