

Blue Lucy Privacy Policy

Overview

This document sets out the privacy policy for Blue Lucy Media Ltd. "Blue Lucy". The purpose of the document is to clearly set out how personal data is processed by the company.

Our approach is transparent, intelligible and in accordance with all applicable data protection legislation including the EU General Data Protection Regulation (GDPR). Blue Lucy is committed to protecting subscribers' data through the application of rigorous security measures and as such this policy may be updated from time to time.

What Personal Data does Blue Lucy Hold?

- A subscriber's FIRST NAME and SURNAME;
- The COMPANY NAME of the subscriber, if provided;
- The EMAIL ADDRESS of the subscriber;
- The business TELEPHONE NUMBER of the subscriber, if provided.

Why does Blue Lucy hold this Data?

The data is held solely for the purposes for the distribution of a corporate newsletter which is published from time to time and delivered by email using a 3rd party mail marketing platform.

Additional data, which is limited to clicked links and mail interactions, is stored and is directly associated with a subscribed user.

Who can Access this Personal Data

Within Blue Lucy access to such personal data is restricted to officers of the company.

The personal data is stored in an on-line Customer Relationship Management (CRM) platform "Capsule CRM" provided by Zestia Ltd. Blue Lucy are satisfied that privacy policies of Capsule CRM, which are available here: [CAPSULE PRIVACY POLICY](#) meet the minimum requirement for Blue Lucy Media Ltd. and those stipulated by GDPR.

In addition Blue Lucy utilise a mail marketing platform "MailChimp" for the distribution of a newsletter which is published via email. Blue Lucy are satisfied that privacy policies of MailChimp which are available here: [MAILCHIMP PRIVACY POLICY](#) meet the minimum requirement for Blue Lucy and those stipulated by GDPR.

Lawfulness

The lawfulness of the processing is based on

- 1) That it is necessary to perform contract or take steps to enter into contract clients, suppliers, people we've sent quotes or that have expressed interest in the past.
- 2) That it is necessary for the legitimate interests pursued by the controller, namely direct marketing purposes.

Your Rights

The GDPR regulations affords a number of rights to individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

How Long does Blue Lucy Store Personal Data?

Personal data is stored as long as the subscriber consents that it may be stored. Personal data will be deleted if the consent from the subscriber is withdrawn.