

## WEBSITE PRIVACY POLICY

### About this privacy policy

This privacy policy has been written to provide you with information about how the London Luton Airport Limited (trading as Luton Rising) (“Luton Rising”, “we”, “us”, “our”) handles or intends to handle personal information relating to visitors to our website (<https://lutonrising.org.uk/>) in accordance with the UK General Data Protection Regulation (“**UK GDPR**”). This policy relates specifically to our collection and use of personal information of visitors to our website.

### About us

We are London Luton Airport Limited, trading as Luton Rising. We are a private limited company (company number 02020381). Our registered office address is Hart House Business Centre, Kimpton Road, Luton, LU2 0LA. We are registered as a data controller with the Information Commissioner’s Office and our registration number is ZA535129.

We aim to process information about you fairly, lawfully, and in a transparent manner. The aim of this policy is to provide you with sufficient information for you to be able to understand what we are doing with your information. If you are unsure how we are handling information about you or you think we could improve our privacy information, please let us know.

### Information we collect

We collect and hold a range of information about visitors to our website. This includes:

- Contact details such as your name, job title, email address, postal address and telephone number.
- Profile details such as your interests, preferences, feedback and survey responses.
- Records of your correspondence you submit to us via our website.
- Technical data including your IP address, your login data, 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 website.
- Your marketing and communications preferences.

### How information is collected

The information we hold will either have been provided by you (e.g. as you interact with us) or be collected by automated technologies as you interact with our website. As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

### Purposes for processing

We have set out below a description of all the ways we plan to use your information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To register your interest in Luton Rising	Contact details Profile details	Consent

	Marketing and communications preferences	
To enable you take part in surveys and/or consultations	Contact details Profile details Marketing and communications preferences	Necessary for our legitimate interests to study how visitors use our website, to develop our website and grow our business
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Contact details Profile details Technical data	Performance of a legal obligation  Necessary for our legitimate interests of running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise
To manage our relationship with visitors to our website, including responding to correspondence	Contact details Profile details Records of correspondence	Necessary for our legitimate interests to improve our services
To use data analytics to improve our website, marketing, relationships and experiences	Technical information	Necessary for our legitimate interests to better understand visitors to our website and their use of our services, to keep our website up to date, to develop our business and to inform our marketing strategy
To send you our email updates because you have requested us to do so	Contact details Marketing and communications information	Consent  Necessary for our legitimate interests to develop our products and services and to grow our business

### **Our marketing communications**

Where you have agreed for us to contact you with updates relating to Luton Rising, we will send you information we believe might be of interest to you via email or text message (we call this marketing communications).

You can ask us to stop sending you marketing communications at any by following the unsubscribe links on any marketing communications sent to you or by contacting us at any time.

## Sharing personal information

Where necessary or required, we may share your personal information as follows:

- With third party service providers, in connection with services performed on our behalf. For example, our email provider, our IT provider, our platform provider and analytics and search engine providers that assist us in the improvement and optimisation of our website.
- With government bodies and law enforcement agencies.
- With our insurers and legal advisers.
- With third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations.
- In connection with legal proceedings (or where we are instructed to do so by Court order).

Our relationships with third party services providers are governed by contractual provisions with us and they only have access to personal information to perform the described purposes and may not use it for other purposes.

## Where we store personal information

The personal information that we collect is stored within the UK and European Economic Area (EEA). However, there may be some circumstances where it is necessary to transfer and store personal information at a destination outside the UK or the EEA. In these circumstances, we will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with data protection law and, in the event that personal information is transferred outside the UK or the EEA, shall ensure that this is carried out subject to the requirements of the UK GDPR.

## How long we keep it for

We will only retain personal information 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..

## Your rights

Under the UK GDPR and the Data Protection Act 2018, you have the following rights:

- **Right of access** - You have the right of access to information we hold about or concerning you.
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data.
- **Right to restriction of processing** – In certain circumstances, you have a right to request that we refrain from processing your data.
- **Right of portability** – In certain circumstances, you have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller.
- **Right to object** – In certain circumstances, you have a right to object to our processing of your personal data.

- **Right to withdraw consent** - In the circumstances where you may have provided consent to the collection, processing and transfer of personal information for a specific purpose has been provided, you have the right to withdraw consent for that specific processing at any time.

Please note, there are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

To exercise any of these rights, please contact Luton Rising's Data Protection Officer using the contact details below.

### **Complaints**

If you have a concern about the way we are collecting or using personal information, we would ask that you raise your concern with us in the first instance by using the contact details below.

You also have a right to lodge a complaint with the Information Commissioner's Office (ICO) should you feel that we have not handled your information in line with legislative and regulatory requirements. They can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113 | [www.ico.org.uk](http://www.ico.org.uk)

### **Contact Details**

For further information on how to request your personal information, exercise any of your data protection rights or request further information in relation to how and why we process your information, you can contact us by emailing the Data Protection Officer at [DataProtection@lutonrising.org.uk](mailto:DataProtection@lutonrising.org.uk)

Alternatively, you can write to the Data Protection Officer at the following address:

Data Protection Officer  
Hart House Business Centre  
Kimpton Road  
Luton  
LU2 0LA

### **Changes to this privacy policy**

We may change this privacy policy from time to time. This privacy policy was last updated in April 2022.