

THE LIGHTING COMPANY GROUP - LEGAL BASIS FOR PROCESSING PERSONALLY IDENTIFIABLE INFORMATION - UPDATED 23th May 2018

KEY:	All customers	PII* being processed	Some automated decision making or scoring	* PII - Personally identifiable Informaiton
	All customers with Transactions (orders)	Potential some PII* being processed (dependant on content)	PII* Data Processed Outside the EU	

PII (Personally identifiable information)									
<u>WHERE IN OUR SYSTEMS WE RECEIVE YOUR DATA</u>	<u>PII</u>	<u>PII Retained for (Timescale)</u>	<u>Basis for Processing</u>	<u>Detail of Legitimate Interest</u>	<u>LIA 3 Step Test - Purpose</u>	<u>LIA 3 Step Test - Necessity</u>	<u>LIA 3 Step Test - Balancing</u>	<u>Data Processed inside the EU</u>	<u>Data Processed Outside the EU</u>
Company wide Email and Customer Service System	Name	6 Company Financial Years	Lawful Basis					Y	Y
	Email Address	6 Company Financial Years	Lawful Basis					Y	Y
	Email Transcript	6 Company Financial Years	Lawful Basis					Y	Y
	Phone Number (voluntary)	6 Company Financial Years	Lawful Basis					Y	Y
Company wide Email and Customer Service System	Name	6 Company Financial Years (Order Date)	Contractual necessity					Y	Y
	Email Address	6 Company Financial Years (Order Date)	Contractual necessity					Y	Y
	Email Transcript	6 Company Financial Years (Order Date)	Contractual necessity					Y	Y
	Delivery Address	6 Company Financial Years (Order Date)	Contractual necessity					Y	Y
	Phone Number (voluntary)	6 Company Financial Years (Order Date)	Contractual necessity					Y	Y
WEB Order System	Customer Name	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Telephone Number	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Web order reference	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Order status (complete, incomplete, refunded)	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Date ordered	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Date dispatched	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Referer (method of finding site)	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Billing address	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Discounts	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Delivery Address	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Email address	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Item(s) ordered	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Amount spent	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Customer Notes	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Customer Name	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Invoice address	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Invoice email	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Invoice phone number	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Delivery address	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	

Order and Stock Management Systems	Delivery email	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Delivery phone number	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Delivery instructions (e.g. leave safe location)	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Sales Order Reference	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Web order Reference	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Account number (auto generated)	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Message Log (Outbound)	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Notes	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
	Incidents	6 Company Financial Years (Order Date)	Compliance with legal obligations					Y	
Payment Gateway	Customer Name	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Customer Email	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Billing Address	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Delivery Address	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Card Holder Address	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Billing Phone Number	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Delivery Phone Number	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Customer Email	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Client IP Address	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Card Type	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Last 4 Digits on Card	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Location - Country / Region / City	6 Company Financial Years (Order Date)	Contractual necessity					Y	
	Fraud Score	6 Company Financial Years (Order Date)	Legitimate interests	Use industry standard fraud check to assess the likelihood to fraud being diminished	To protect the integrity of the financial transaction and protect against fraud to our company and to protect other customers.	Without such checks in place online shopping would be impractical for the retailer due to the number of fraudulent transactions.	A customer can consider their data to be used in this way as part of their transaction with limited impact on the data subject		Y
ISP (Internet Service Provider)	6 Company Financial Years (Order Date)	Contractual necessity						Y	
Online Shop - Customer / Subscriber / Enewsletter System - Current Subscriber	First Name	Until consent is withdrawn	Consent					Y	
	Last Name	Until consent is withdrawn	Consent					Y	
	Email address	Until consent is withdrawn	Consent					Y	
	Subscriber log - Version of T&C's	Until consent is withdrawn	Consent					Y	
	Date Subscribed	Until consent is withdrawn	Consent					Y	
Online shop (Wishlist / E Wallet / Voucher holder) - customer that has not Ordered	First Name	Until consent is withdrawn	Consent					Y	
	Last Name	Until consent is withdrawn	Consent					Y	
	Email address	Until consent is withdrawn	Consent					Y	
	Address	Until consent is withdrawn	Consent					Y	
	Phone Number	Until consent is withdrawn	Consent					Y	
	Website	Until consent is withdrawn	Consent					Y	

	Contact Preferences	Until consent is withdrawn	Consent						Y	
	Notes	Until consent is withdrawn	Consent						Y	
	Subscriber Preferences	Until consent is withdrawn	Consent						Y	
Online Shop - Customers (also subscribers) - Not ordered	First Name	Until consent is withdrawn	Consent						Y	
	Last Name	Until consent is withdrawn	Consent						Y	
	Email address	Until consent is withdrawn	Consent						Y	
	Address	Until consent is withdrawn	Consent						Y	
	Phone Number	Until consent is withdrawn	Consent						Y	
	Website	Until consent is withdrawn	Consent						Y	
	Contact Preferences	Until consent is withdrawn	Consent						Y	
	Notes	Until consent is withdrawn	Consent						Y	
	Subscriber Preferences	Until consent is withdrawn	Consent						Y	
	Online Shop - Customers (Ordered)	First Name	6 Company Financial Years (Order Date)	Compliance with legal obligations						Y
Last Name		6 Company Financial Years (Order Date)	Compliance with legal obligations						Y	
Email address		6 Company Financial Years (Order Date)	Compliance with legal obligations						Y	
Address		6 Company Financial Years (Order Date)	Compliance with legal obligations						Y	
Phone Number		6 Company Financial Years (Order Date)	Compliance with legal obligations						Y	
Website		6 Company Financial Years (Order Date)	Compliance with legal obligations						Y	
Contact Preferences		Until consent is withdrawn	Consent						Y	
Notes		6 Company Financial Years (Order Date)	Compliance with legal obligations						Y	
Subscriber Preferences		Until consent is withdrawn	Consent						Y	
Order History		6 Company Financial Years (Order Date)	Compliance with legal obligations						Y	
Online Chat Platform	Name	Until consent is withdrawn	Consent						Y	
	E-Mail address (Optional Field)	Until consent is withdrawn	Consent						Y	
Company Phone System	Business number called	30 days	Processing not requiring identification						Y	
	Call Duration	30 days	Processing not requiring identification						Y	
	Date and time of call	30 days	Processing not requiring identification						Y	
	Customer phone number	30 days	Processing not requiring identification						Y	
	Answered/Unanswered	30 days	Processing not requiring identification						Y	