



Lucien Pagès & AIPR – Privacy Notice for Industry VIPs

Who we are?

Lucien Pagès & AIPR is made up of different legal entities which trade as “Lucien Pagès”, “AIPR” or “Lucien Pagès & AIPR”, all of which are subsidiary undertakings of The Independents Holding Limited in the UK – CRN: 10186775 (together, the “**Lucien Pagès & AIPR Group**”).

This privacy notice is issued on behalf of the Lucien Pagès & AIPR Group, so when we mention “**Lucien Pagès & AIPR**”, “**Company**”, “**we**”, “**us**” or “**our**” in this privacy notice, we are referring to the relevant company in the Lucien Pagès & AIPR Group responsible for processing your data. Lucien Pagès & AIPR is part of the group of agencies comprising The Independents Group (together, “**The Independents Group**”).

This is our Privacy Notice for Industry VIPs. Please read this Privacy Notice to ensure you are aware of how and why we use your personal data and how we comply with the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) and all other applicable data protection laws (together, “**Data Protection Laws**”).

What we do?

Lucien Pagès & AIPR provides communication, PR and event services for luxury and lifestyle brands (“**Services**”). In connection with these Services, we have compiled and maintain a web-based database of industry experts, journalists, stylists, influencers, VIPs and talents (together, “**Industry VIPs**”), hosted by Launchmetrics, called Fashion GPS Radar (previously known as Fashion GPS and Fashion Radar) (the “**Launchmetrics Database**”). The Launchmetrics Database enables our teams to find and feed contact, professional and industry details and other personal data of Industry VIPs, such as passport details for bookings, dietary requirements, dates of birth etc. in each case as relevant for the business and the Services.

In this Privacy Notice, the terms “**you**” or “**your**” will apply to the extent Lucien Pagès & AIPR collects and stores your personal data as an Industry VIP in connection with the Launchmetrics Database.

Lucien Pagès & AIPR respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you (i) how we protect your personal data when it is used on the Launchmetrics Database, (ii) of your privacy rights and (iii) how the Data Protection Laws protect you.

We act as a controller of the personal data which we obtain about you.

What data do we process and how is it obtained?

Personal data is any information about an individual which makes them identifiable. It does not include anonymous data – being where the identity is removed.

We collate, store and use different kinds of data available to us about Industry VIPs. In respect of Industry VIPs, the majority of such data is provided directly by such Industry VIP. In respect of Industry VIPs, we may also collect certain personal data from third parties, such as clients, although we would never purchase such data.

For Industry VIPs, such personal data may include:

- (i) your name, age, email address and company/brand;
- (ii) your passport details for organising bookings;
- (iii) your account name, social media handles and any other online identifiers;
- (iv) shoe/dress sizes;
- (v) dietary requirements;
- (vi) dates of birth; and
- (vii) any other information which may be relevant to our Services, including gifting – eg family members.

How is your personal data used?

We only use your personal data to the extent permitted by applicable laws. We do not typically share your personal data with clients. We use your personal data where it is necessary to pursue our legitimate interests which is to provide our Services to our clients and also for your benefit. Your interests and underlying rights do not override such interests.

The Launchmetrics Database directly benefits Industry VIPs. This is by providing them the opportunity to attend various high profile and elite events and also to receive giftings and sample loans. Further, the Launchmetrics Database may also benefit Industry VIPs by facilitating connections and collaborations with brands to enable such brands to expand the presence of such Industry VIPs in the wider marketing environment. This in turn allows Industry VIPs to enhance their brand, specialisms and expertise.

The Launchmetrics Database therefore provides a mutual benefit to both brands and Industry VIPs by empowering each to build important and strategic relationships for their shared benefit.

Your personal data may also be used (i) where you have provided consent to the processing (subject to your withdrawal at any time), (ii) where it is necessary for us to comply with a legal obligation, or (iii) where it is necessary to perform a contract.

For what purpose will your personal data be used?

We process your personal data to enable Lucien Pagès & AIPR to provide Services to its clients. Such Services include arranging guest lists for events, designing social media campaigns and Industry VIP collaborations and, in respect of client products, sample loans and gifting. As above, we also use your personal data to enable us to connect you with clients and brands.

Opting-out or Unsubscribing

In certain circumstances you may have the right to request that we stop processing your personal data. To seek to exercise any such right, please contact legal@the-independents.com.

Lucien Pagès & AIPR reserves the right to refuse any such request to the extent permitted by applicable law.

Potential disclosures of your personal data

We do not typically share your personal data with clients. Very occasionally, time or logistics may dictate that we may share limited contact details with a client or third party mailing or courier company in connection with a defined campaign. In such situations we ensure all such persons are subject to strict confidentiality obligations.

Otherwise, we may share your personal data with third party service providers providing us with IT and hosting related services – for example Launchmetrics.

Lastly, we may disclose your personal data to our professional advisers or any other persons to whom we are under a legal, professional or contractual duty to disclose.

Where a disclosure needs to be made to a third party, we will use our reasonable efforts to ensure that such persons respect the security of your personal data and Data Protection Laws.

International transfer of personal data

Any personal data we collect may be transferred from time to time to throughout the world – to our group personnel or third parties. Further, the Launchmetrics Database may be accessed anywhere in the world by authorised Lucien Pagès & AIPR employees, including countries which may not have equivalent data protection laws.

Where we transfer your personal data outside of the EEA to countries which do not ensure adequate protection of personal data, we seek to use specific contracts approved pursuant to Data Protection Law. This requires such parties to protect your personal data to the standards required in the European Economic Area pursuant to the GDPR. To the extent we seek to rely on another basis for safe transfer of your personal data outside of the EEA, we will keep you updated by way of an update to this Privacy Notice.

Data security

We operate appropriate security measures designed to prevent accidental or unauthorised loss or access to your personal data. Further, we restrict access to your personal data to only those persons who have a business need to know. Persons processing your personal data on our behalf will only process your personal data pursuant to our instructions and are subject to duties of confidentiality.

Data retention

We only retain your personal data for as long as necessary to fulfil the purposes for which it was obtained. For this we consider the amount, nature and sensitivity of the applicable personal data, as well as the potential risk from unauthorised use or disclosure, the purposes for which we process your personal data, whether those purposes can be achieved by other means and any other applicable legal requirements.

Your legal rights

In certain circumstances, you may have specific rights under Data Protection Laws in respect of your personal data, including:

- To request access to your personal data – enabling you to obtain a copy of the personal data we hold about you in order to check it is being lawfully processed.
- To request correction of your personal data – enabling you to have us correct any incomplete or inaccurate data we hold about you.
- To request erasure of your personal data – enabling you to have your personal data deleted where there is no good reason for us continuing to process it and where we are lawfully able to comply with your request.
- To object to processing of your personal data – in particular where we rely on a legitimate interest you consider it impacts your fundamental rights and freedoms or constitutes “profiling”.
- To request restriction of processing of your personal data – enabling you to ask us to suspend the processing of your personal data in certain scenarios.

If you wish to exercise any of these rights, please email legal@the-independents.com. Lucien Pagès & AIPR reserves the right to refuse any such request to the extent permitted by applicable law.

Data requests

You will typically not be required to pay a fee to access your personal data or exercise any of your rights. However, we may be permitted to charge a reasonable fee or refuse to comply with your request to the extent your request is unfounded, repetitive or excessive. We aim to respond to all legitimate requests within one month.

Changes to this Privacy Notice

Please note that we continually review this Privacy Notice and it is updated from time to time. Please be sure to check frequently for any updates.

Further assistance

Please contact legal@the-independents.com to the extent you have any questions regarding this Privacy Notice.

You may have the right to make a complaint at any time to the applicable supervisory authority which regulates the processing of personal data in the country in which you are located. However, we would appreciate the opportunity to deal with any concern before you approach such supervisory authority and welcome you to contact us at legal@the-independents.com in the first instance.

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