

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”, 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**”).

This Privacy Notice supplements our General Privacy Notice and should be read together with it, including the Local Law Addendum and any applicable local privacy schedules made available on our website. The General Privacy Notice contains further information about our group structure, the relevant controllers, international transfers, data subject rights, local law requirements and how to contact us.

If there is any inconsistency between this Privacy Notice and the General Privacy Notice, this Privacy Notice will apply in relation to the specific processing described below, unless applicable local law requires otherwise.

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, 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 identify, record and manage contact, professional and industry details and other personal data of Industry VIPs, such as passport details for bookings, shoe/dress sizes, dietary requirements and dates of birth, in each case where relevant for our 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.

The relevant Lucien Pagès & AIPR entity responsible for your relationship with us or the relevant campaign, event, database activity will act as controller of your personal data. Further details of the Lucien Pagès & AIPR entities acting as controllers are set out in our General Privacy Notice.

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. The majority of such data is provided directly by such Industry VIP. We may also collect certain personal data from third parties, such as clients, event partners, public sources, professional directories, social media profiles or press sources, 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 account name, social media handles and any other online identifiers;
- (iii) shoe/dress sizes;
- (iv) dietary requirements;
- (v) your passport details for organising bookings;
- (vi) dates of birth; and
- (vii) any other information which may be relevant to our Services, including information you provide to us in connection with gifting, invitations or event arrangements, such as limited details relating to family members or guests.

Some information we process may be special category data, sensitive personal data or sensitive personal information under applicable law. This may include dietary or allergy information where it reveals health, religious or philosophical information, accessibility requirements, health and safety information, passport or identity details, information relating to minors, or other information required for travel, accommodation, event access, security, production, gifting, sample loans, fittings or bookings. We process this information only where necessary, proportionate and permitted by law. Where required, we rely on explicit consent, separate consent, substantial public interest, health and safety obligations, contractual necessity, legal obligations or another applicable lawful condition. We do not use such information for unrelated marketing, profiling or discriminatory purposes.

Where we obtain personal data from public sources, clients, event partners, agents, representatives, professional directories, social media profiles or press sources, we provide privacy information directly where reasonably practicable. Where direct notification would involve disproportionate effort, for example because of the size and nature of the database and the limited professional context of the data, we rely on public privacy notices and appropriate safeguards, and we document that assessment internally.

How is your personal data used?

We only use your personal data to the extent permitted by applicable law. Depending on the relevant activity, we may process your personal data on the basis of our legitimate interests, your consent, performance of a contract, compliance with legal obligations or other lawful grounds available under applicable local law.

Our legitimate interests include providing our Services to clients, managing event attendance, maintaining industry contacts, facilitating collaborations, sending relevant communications, administering gifting and sample loans, and managing relationships with Industry VIPs, clients and brands. We have considered and balanced these interests against your rights and freedoms.

The Launchmetrics Database directly benefit 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.

Further information about the lawful bases on which we rely is set out in our General Privacy Notice.

Lawful basis

Purpose	Data	Lawful basis
Maintaining Industry VIP, journalist, talent, influencer and guest relationships	Contact, professional, profile and relationship data	Legitimate interests
Event invitations, guest lists, RSVP and attendance management	Identity, contact, event, RSVP and attendance data	Legitimate interests; consent where required
Gifting, product seeding, sample loans, dressing, fittings and showroom activity	Contact, delivery, sizing, preference, sample and relationship data	Legitimate interests; performance of contract
Travel, accommodation, accreditation and access	Passport, travel, identity, date of birth, accommodation, itinerary and access data	Performance of contract; legitimate interests; legal obligation; explicit/separate consent where required
Dietary, allergy, accessibility, health and safety accommodations	Dietary, allergy, accessibility or limited health/safety data	Explicit/separate consent where required; legal obligation; legitimate interests; substantial public interest or other local law condition where applicable
Client campaign, PR, collaboration and reporting activity	Contact, public profile, campaign participation and reporting data	Legitimate interests; performance of contract
Payment, tax, invoicing and subscription administration	Payment, billing, invoice and transaction data	Performance of contract; legal obligation

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 email DPO@the-independents.com.

We will comply with your request where required by applicable law. In some circumstances, we may be permitted or required to continue processing certain personal data, for example for legal, regulatory, security, accounting, dispute or suppression-list purposes.

Potential disclosures of your personal data

We do not routinely share full Industry VIP profiles with clients. However, where relevant to a defined campaign, event, collaboration, booking, gifting, sample loan or other Service, we may share limited personal data with clients, brands, event partners, logistics providers, travel providers, venues or mailing companies where necessary for that purpose. In such situations, we take steps designed to ensure that recipients handle your personal data securely and in accordance with applicable Data Protection Laws.

Otherwise, we may share your personal data with third party service providers and platforms providing us with IT, hosting, CRM, database, email marketing, event administration, analytics, payment and related services, including Launchmetrics for Industry VIP data. These providers may process personal data in countries outside your country of residence, subject to appropriate safeguards where required by law.

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.

Our Industry VIP, journalist, influencer, talent and guest relationship information may include confidential and proprietary Agency relationship data. We do not provide unrestricted access to our databases to clients or third parties. Where we share information, we limit it to what is necessary for a defined event, campaign, collaboration, booking, gifting, sample loan, production, reporting or client service purpose.

Where we disclose personal data to third parties, we take appropriate steps designed to ensure that such persons respect the security of your personal data and process it in accordance with applicable Data Protection Laws.

International transfer of personal data

Because we operate as part of an international group, your personal data may be accessed by or transferred to Lucien Pagès & AIPR Group, The Independents Group, Launchmetrics and other service providers or business partners in jurisdictions outside your country of residence, including the UK, EEA, United States, Hong Kong, Singapore, Korea, PRC / Mainland China and other countries in which we or our service providers operate.

Where we transfer personal data internationally, we take steps designed to ensure appropriate protection in accordance with applicable law. These may include adequacy decisions, EU Standard Contractual Clauses, UK-approved transfer mechanisms, transfer impact assessments, contractual safeguards, consent where required, local filings or assessments where required, or other lawful transfer mechanisms.

More information about international transfers is set out in our General Privacy Notice and Local Law Addendum.

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 retain your personal data only for as long as reasonably necessary for the purposes for which it was obtained, including to manage Industry VIP relationships, administer events, gifting, sample loans, bookings, campaigns, the Launchmetrics Database, legal and regulatory obligations, disputes and our legitimate business records.

In general:

- Industry VIP profile and relationship data is retained for as long as you remain relevant to our Services, campaigns, events, industry relationships or client work, unless you object or request deletion and we are required or able to comply.
- Event, gifting, sample loan, booking and campaign records are retained for the duration of the relevant activity and for a reasonable period afterwards for business administration, legal, audit and dispute purposes.
- Passport, travel, accommodation, dietary, accessibility or similar event logistics information is retained only for as long as necessary for the relevant booking, event, travel, security, health and safety or legal purpose and is normally deleted after that purpose has been completed, unless a longer period is required by law.
- Payment, billing and subscription records are retained for as long as required for tax, accounting, legal and audit purposes.

When determining the appropriate retention period, we consider the nature and sensitivity of the personal data, the purposes for which it is processed, applicable legal limitation periods, regulatory requirements and our legitimate business needs. Further details are set out in our Data Retention Policy, available on request.

When personal data is no longer required, we will delete it, anonymise it or securely archive it in accordance with our policies and applicable law.

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.

Further details of your rights, including any additional rights available under applicable local law, are set out in our General Privacy Notice, Local Law Addendum and any applicable local privacy schedule.

If you wish to exercise any of these rights, please email DPO@the-independents.com. We will comply with your request where required by applicable law. In some circumstances, we may be permitted or required to continue processing certain personal data, for example for legal, regulatory, security, accounting, dispute or suppression-list purposes.

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 or within such other timeframe as required by applicable law.

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 and complaints

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

If you are located in the European Economic Area (EEA), the United Kingdom or Switzerland, you have the right to make a complaint at any time to your local data protection supervisory authority.

For example, you may contact:

- The UK Information Commissioner's Office (ICO): <https://ico.org.uk/make-a-complaint/>; or
- The French Commission Nationale de l'Informatique et des Libertés (CNIL): <https://www.cnil.fr/en/contact-cnil>

A list of EU/EEA Data Protection Authorities can be found here: https://edpb.europa.eu/about-edpb/board/members_en.

We would, however, appreciate the chance to address your concerns before you approach a supervisory authority, so please contact us in the first instance at DPO@the-independents.com.

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