

General Privacy Notice

Updated 7 December 2023

Epoch Performance LLC

We are a certified organization to provide solutions utilizing Lumina Learning Tools and Services. We follow all privacy laws and rules set forth by Lumina Learning.

About us

Lumina Learning is a provider of innovative psychometric and competency questionnaires and products. We provide an online platform that allows different users to interact and share data, such as by completing questionnaire tasks from which resources, models and reports are created.

“Lumina Learning, we, us, our” in this notice means Lumina Learning Limited (registered in England and Wales, Company Number 07021544), unless you are informed that a different Lumina Learning entity is gathering your personal data. We are committed to treating your personal data fairly and transparently. We encourage you to contact us if you have any questions about this notice.

Introduction

This General Privacy Notice explains how we use your personal data when you use our services.

You are most likely to interact with us via the ‘Lumina Platform’, which means our website located at <https://luminalearning.com> and our mobile apps. Some features of the Lumina Platform require you to create a Lumina Account that holds your personal data.

You may also interact with us via other channels, such as at one of our events, via email or via message submitted to our helpdesk.

Some of our services require us to gather additional data about you that is not covered by this General Privacy Notice. Please consult our other privacy notices for further details:

- If you are, or work with, a Lumina Learning business customer or a Lumina Learning Practitioner, our [Practitioner Privacy Notice](#) explains how we use data collected in connection with implementing our customer agreement
- If you take part in a program run by Lumina Learning, we will provide you with a privacy notice during the registration process that explains how we use data collected in connection with the task

Your use of the Lumina Platform

The Lumina Platform is our website located at <https://luminalearning.com> and our mobile apps. We provide the Lumina Platform so that you can store data about yourself and access resources, and to facilitate your interactions with other platform users. Other platform users may ask you to provide data by completing tasks, such as questionnaires about yourself and other people. After you complete a task, the other platform user may give you access to resources based on the task. A platform user who asks you to complete a task is typically one of our business customers. For example, your employer or someone

acting on behalf of your employer may ask you to complete a questionnaire to take part in a program they have organized.

Please note that other users of the Lumina Platform are not part of Lumina Learning. Any data that you share with another platform user is controlled by them for their own purposes and not covered by this notice. If you have questions about how a platform user uses your data, please contact them directly.

Data we collect about you

We collect the following types of data about you:

- **Basic Personal Details** – when you create a Lumina Account, you provide your name, email address, and gender or linguistic gender preferences
- **Usage Data** – we collect data about how you use the Lumina Platform, including details of the device you use, browser and plugin details and records of pages you visit data about the tasks you complete, the other platform users and features you interact with, and your approximate location based on your IP address
- **Identity Provider Data** – if you sign into your Lumina Account using a third-party identity provider (for example, Google), we obtain some data from the identity provider. Confirmation of the data we obtain is displayed the first time you sign in using the identity provider
- **Cookies Data** – we use cookies to ensure the security of the Lumina Platform, allow you to sign into your Lumina Account, and to track activity on our website to monitor and improve it. Cookies may store information about the device you use and your location, based on your IP address. When we use cookies, we will display a webpage banner that tells you more about the cookies being used
- **Mobile App Data** – when you use our mobile apps, we gather a copy of data that you enter the app. We also gather data about you that other people enter their apps. For example, when you or someone else scans your Splash in the Lumina Splash app. We also log details about your mobile device and how you use the apps
- **Additional Personal Details** – when you create a Lumina Account, you may be asked to provide additional personal data, including your date of birth, education details, employment details and demographic data. It is optional whether you provide this data
- **Task Data** – when another platform user gathers data about you, such as by asking you or other people to complete tasks they use this data for their own purposes. They may also share a copy of this data with us
- **Other Data** – we hold data about you if you interact with us in other ways. For example, if you subscribe to or express an interest in any of our services, subscribe to our marketing or newsletter lists or submit a helpdesk ticket. We may also hold data about you submitted by other people who interact with us. For example, if someone submits a helpdesk ticket containing data about you

How your data is used

We use your data for the following purposes:

- To provide the Lumina Platform and your Lumina Account
- To facilitate your interactions with other users of the Lumina Platform
- To respond to your requests and requests from other platform users that you interact with
- To provide you with any services and resources you use or express an interest in

- To provide you with essential communications regarding technical, security and legal issues. These communications may contain your personal data
- To provide you with other communications you consent to receive. These communications may contain your personal data
- To research, analyze and enhance our products and services, including to avoid bias and discrimination
- To conduct our business operations and analyze our business performance, such as by monitoring the usage of our products and services
- To support the maintenance, enhancement and security of our systems
- To comply with legal and regulatory obligations, maintain our records, exercise or defend legal claims, and to prevent fraud and other illegal or harmful activities

We process your data based on the following grounds:

- Our legitimate business interest to achieve the purposes detailed in this notice
- To comply with our legal and regulatory obligations
- In relation to your Additional Personal Details and Task Data, based on your consent

Where we process your data based on our legitimate interest, you have the right to object to this processing. Where we process your data based on your consent, you have the right to withdraw your consent at any time and we will erase this data. For more details, please see 'Your data rights and how to exercise them'.

Data sharing

Data you share with others

When you interact with other users of the Lumina Platform, you share your Basic Personal Details with them. When another platform user asks you to complete a task, they may ask you to provide additional data. The other platform user uses your data for their own purposes. To give you control, you can choose whether to share your data.

If you have questions about how your data is used by the other platform user, please contact them directly. Please be aware that you are responsible for deciding to share your data and it may not be possible to unshare it later.

Data we share with others

We disclose your data where necessary to achieve the purposes described in this notice. We disclose your data to:

- Other entities in the Lumina Learning group – these are entities who are part of our corporate group and perform some of our business functions
- The Lumina Learning Network – these are third parties who represent our business globally and perform some business functions on our behalf, typically termed Lumina Learning Partners, Lumina Learning Strategic Alliances, Lumina Learning Associates or Lumina Learning Practitioners
- Professional advisers and service providers – these are third parties who help us run our business by providing their services and expertise. For example, legal, accounting and

consultancy professional advisers, and providers of services such as webhosting and business productivity tools

- Parties involved in the sale or reorganization of our business – if the ownership of all or part of our business changes or we enter administration, your data may be shared with the other parties involved. This includes where we take preparatory steps in connection with such activities
- Relevant authorities and law enforcement agencies – we may share your data where we are required to by applicable laws, as part of government enquiries or judicial proceedings

We never sell your data to third parties for marketing purposes.

International data transfers

We store your data inside the UK or European Economic Area (EEA) wherever possible. However, sometimes it may be necessary to transfer your data to outside the UK or EEA to achieve the purposes described in this notice.

We ensure that appropriate safeguards are in place when we transfer your data outside the UK or EEA. We take some or all the following steps to protect your data:

- Use of technical security measures, such as data encryption, and organizational measures such as binding policies and procedures
- Transfer to third parties located in countries or territories that data protection authorities have approved as providing appropriate safeguards
- Transfer to third parties that take part in binding schemes that data protection authorities have approved as providing adequate safeguards
- Transfer to third parties with whom we have agreed model contract clauses provided by data protection authorities that have been created to ensure adequate safeguards are provided

Data retention

We retain your data for as long as necessary to achieve the purposes set out in this notice. This is usually seven years from when you last interacted with us, for example, from when you last used the Lumina Platform. This is to allow you full use of our services and continued access to Lumina Platform functionality and resources provided by us and other platform users. We may retain your data for a longer period where we process your data to comply with legal and regulatory obligations, maintain our records, exercise or defend legal claims, and to prevent fraud and other illegal or harmful activities.

Your data rights and how to exercise them

You have the right to access, rectify, port and in some cases erase your personal data. You also have the right to:

- Object to processing – where data is processed based on our legitimate interests, you have the right to object to this processing based on grounds relating to your situation
- Withdraw consent – where data is processed with your consent, you have the right to withdraw your consent at any time and we will erase your data

To exercise your data rights, please contact us using the details below.

Please note, if you choose to share data with another user of the Lumina Platform, they control the shared data. To exercise your data rights in relation to the shared data, please contact the other platform user directly.

Updates to this notice

We may update this notice from time to time. We will post updates here and notify you of any changes that materially affect you.

Questions and complaints

If you have any questions or concerns about how we have handled your personal data, we encourage you to contact us directly using our contact details below. We commit to investigating and resolving your issue wherever possible.

You also have the right to complain to the data protection authority in your country, or our local data protection authority (the United Kingdom's Information Commissioner's Office), or a court of competent jurisdiction.

Contact us

To contact us, please email the Lumina Learning Privacy Team at privacy@luminalearning.com.

Please note, when we gather your data, we will ask you to provide your email address to act as a unique way to identify you. Please submit your request from that email address to allow us to verify your identity and respond to your request. If you contact us from a different email address, we will not be able to respond to your request.