



L.E.K. Consulting LLP

L.E.K. GDPR Privacy Notice Relating to EU Marketing, Business
Development and Alumni

February 2019



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1. IMPORTANT INFORMATION AND WHO WE ARE

1.1. Purpose of privacy notice

L.E.K. Consulting respects your privacy and is committed to protecting your personal data. This privacy notice aims to give you information on how L.E.K. Consulting collects and processes your personal data, including any data you may provide through the use of the lek.com website or as part of any of our subscription services.

We do not knowingly collect personal data relating to children or persons under the age of 16 and our website or communications are not extended to such persons.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. Please also refer to the Glossary to understand the meaning of some of the terms used in this Privacy Notice. This privacy notice supplements the other notices and is not intended to override them.

1.2. Controller

L.E.K. Consulting LLP, together with its global associated offices acting under the “L.E.K.” brand is the controller of, and responsible for, the personal data we hold or you may provide us, (collectively referred to as “L.E.K. Consulting”, “we”, “us” or “our” in the privacy notice).

This privacy notice is issued on behalf of the L.E.K. Consulting group so when we mention “L.E.K. Consulting”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the group which has collected or processed your data. If you have any questions about the particular entity processing your personal data please let us know on the contact details below.

1.3. Contact details

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager by emailing dataprivacymanager@lek.com or using the postal details set out below:

L.E.K. Consulting LLP
Attn: Data Privacy Manager
40 Grosvenor Place
London
SW1X 7JL

You have the right to make a complaint at any time to the relevant data protection authority, such as the [Information Commissioner's Office \(ICO\)](#), the UK supervisory authority for data protection issues.



We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.4. Changes to the privacy notice and your duty to inform us of changes

This version of the privacy notice was last updated in February 2019. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1.5. Third-party links

The lek.com website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.



2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes title, first name, maiden name, last name, username or similar identifier, nationality and gender
- **Contact Data** includes corporate and/or personal addresses, email address and telephone numbers (both mobile and/or fixed line)
- **Technical Data** includes internet protocol (IP) addresses, 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 the L.E.K. website or any L.E.K. intranet
- **Profile Data** includes details on your username and password where collected, details on business development or client engagement activities, your corporate interests, preferences, feedback and survey responses you may provide
- **Usage Data** includes information about how you use our website or how you interact with us such as your responses to event invitations or downloads of articles or publications
- **Marketing and Communications Data** includes your preferences in receiving marketing communications from us and your communication preferences

We also collect, use, store and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

In the processing of data in relation to our marketing, business development or Alumni activities, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.



2.1. If you fail to provide personal data

Where we need to collect personal data, for the purposes of communicating with you, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Marketing Data by filling in forms or by corresponding with us by use of our website, post, phone, email or otherwise. This includes personal data you provide when you:
 - engage, or enquire about, our services
 - request marketing information to be sent to you
 - complete contact forms either manually or on the L.E.K. website, including alumni registration
 - provide us with a business card
 - enter a competition, promotion or survey
 - give us some feedback
 - complete an L.E.K. Leaver form (for ex-employees only)
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Identity and 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
- **Third parties or publicly available sources.** We may receive or collect personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics and email subscription providers such as DotMailer, and LinkedIn, based in the EU, or European Economic Area (EEA) territories and HubSpot, Google Analytics, New Relic and AddThis based inside and outside the EEA
 - Identity and Contact Data from publicly available sources such as LinkedIn, Companies House, trade associations and publications or corporate or personal websites



4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where you have provided us with specific consent to process your personal data
- Where we need to comply with a legal or regulatory obligation
- Where we need to perform the contract we are about to enter into or have entered into with you

For the purposes of marketing and business development communications we rely on Legitimate Interest as a legal basis for the processing of your personal data in accordance with this notice. For the purposes of processing of your personal data in connection with the L.E.K. Alumni Network (or any other purpose for which we have asked for your consent), we rely on your consent as a legal basis for the processing. If you are a user of the alumni section of our website and you choose to provide your contact information in our searchable directory, other alumni and L.E.K. staff will also have access to your contact information and may use such information to contact you. L.E.K. will only contact you in connection with the L.E.K. Alumni Network or as we have otherwise stated in this notice. You have the right to withdraw your consent at any time by emailing dataprivacymanager@lek.com or writing to us at:

L.E.K. Consulting LLP
Attn: Marketing
40 Grosvenor Place
London
SW1X 7JL

4.1. Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.



Purpose/Activity	Type of data	Lawful basis for processing
To register and provide direct marketing on L.E.K. services to corporate individuals	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests in developing and growing our business and informing you of our offer and range of services
To register and provide direct marketing to L.E.K. alumni in relation to the L.E.K. Alumni Network	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Consent is necessary to send marketing communications to L.E.K. alumni. Communications are limited to news and events in relation to the L.E.K. Alumni Network
To provide access to the L.E.K. alumni website and directory	(a) Identity (b) Contact (c) Profile (d) Usage	Consent is required to list your contact information in the searchable directory which is accessed by other alumni and L.E.K. staff. The contact data provided here is not used to update L.E.K. records, or used for marketing purposes
To provide contracting opportunities to the alumni members	(a) Identity (b) Contact (c) Profile	Consent is necessary to send contracting opportunities to the L.E.K. alumni. Communications are limited to available opportunities
To register you as a new contact with the firm for business development reasons	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Necessary for our legitimate interest in establishing a business relationship with you and provide you with information of our offer and range of services



<p>To manage our relationship with you which will include:</p> <p>(a) notifying you about changes to our privacy notice or other terms which may apply in our relationship</p> <p>(b) asking you to leave a review, provide feedback or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services and website and how alumni interact with us)</p>
<p>To enable you to partake in a prize draw, competition or to complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services and website and how alumni interact with us)</p>
<p>To administer and protect our business and the L.E.K. website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for 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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to deliver relevant website content, improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Identity</p> <p>(b) Technical</p> <p>(c) Usage</p>	<p>Necessary for our legitimate interests to deliver relevant content, define types of customers for our products and services, to keep our website updated and relevant, and to develop our business and to inform our marketing strategy</p>



To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business and website and alumni interaction with us)
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4.2. Marketing, Business Development and L.E.K. Alumni Network

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what product and services may be relevant to you or what events we think you may be interested in attending.

You will receive marketing and business development communications from us where we have collected your contact details from direct interactions or we have obtained your details from a third party or a publically available source. In each case, you have opted-in, or have not unsubscribed, to receiving those communications. In some instances, such as for the L.E.K. Alumni Network, we will collect your specific consent as mentioned above and consent can be withdrawn at any time.

4.3. Third-party marketing

Other than as mentioned in this privacy notice we will get your express opt-in consent before we share your personal data with any company outside the L.E.K. Consulting group of companies for marketing purposes.

4.4. Opting out

You can ask us to stop sending you marketing, business development or L.E.K. Alumni Network communications at any time by following the unsubscribe links on any marketing or L.E.K. Alumni Network communications sent to you or by [contacting us](#) at any time or by writing to the address provided above.

Where you opt out of receiving marketing, business development or L.E.K. Alumni Network communications, this will not apply to personal data provided to us as a result of past employment or in connection with non-marketing or alumni activities which we will continue to hold for our stated legal basis.

4.5. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).



4.6. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or, if required, seek your consent.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



5. DISCLOSURES OF YOUR PERSONAL DATA

In the context of its marketing, business development or L.E.K. Alumni Network processing activities, L.E.K. Consulting does not sell or license personal data to third parties. However, in such context, we may share your personal data with third parties including the parties set out below, in each case, for the purposes set out in the table in section 4 above:

- Internal Third Parties, being the L.E.K. Consulting group companies and associated entities on a global basis
- External Third Parties providing services to any L.E.K. Consulting group company or associated entity, including dotMailer, HubSpot, LinkedIn, Grove Marketing, Google Analytics, New Relic and Add This, third parties assisting us in maintaining our website, distributing emails to you and processing requests to participate in events
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, if we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners, or combined group, may use your personal data in the same way as set out in this privacy notice, otherwise you would be notified of any change

We require all third parties to respect the security of your personal data and to treat it in accordance with applicable law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

L.E.K. Consulting reserves the right to disclose any information we may hold on you where required by law or to comply with valid legal or regulatory processes to protect L.E.K. Consulting's rights or as otherwise permitted by the applicable data protection laws and regulations protecting your personal data.



6. INTERNATIONAL TRANSFERS

We share your personal data within the L.E.K. Consulting group companies on a global basis. In relation to the L.E.K. Consulting group companies operating in the EU, this involves transferring your data outside the EEA.

We ensure your personal data is protected by requiring all our group companies to follow the same rules as we do in our EU offices when processing your personal data.

Some of our external third parties, with whom we have stated we share your personal data, are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to [countries](#) that have been deemed to provide an adequate level of protection for personal data by the European Commission
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. These are known as the [EU Model Clauses](#). Alternatively, we may ask them to enter into contractual obligations relating to the processing of personal data which would be required by a data processor in the EU
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#)

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.



7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

Despite these precautions, L.E.K. can not guarantee the security of the information collected from third parties or transmitted through our website or guarantee the security of emails. Therefore, we assume no liability for any disclosure of information collected arising from the acts of third parties or other events, acts or omissions outside of our control including interruption of service or any issues related to the use of the internet.



8. DATA RETENTION

8.1. How long will we use your personal data for?

L.E.K. will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including, where applicable, for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

Details of retention periods applied to your personal data can be requested by [contacting us](#) but we keep basic information about you for six years after you cease to use our services or hold other communication with us. This data retention schedule comes into effect January 2020, six years since the launch of our current contact database. In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please [contact us](#). However, there are circumstances in which those rights may not be available to you and we may not satisfy your request.

9.1. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.2. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.3. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Consent means “any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her”. You can obtain further information on how we have collected your consent, or withdraw your consent at any time by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies and associated entities in the L.E.K. Consulting group acting as joint controllers or processors and who are based in Europe, the Americas and Asia-Pacific countries in which we operate. Please [see here](#) for a full list of L.E.K. offices.

External Third Parties

Service providers acting as processors based within Europe (dotMailer, LinkedIn) and the U.S. (Google Analytics, HubSpot, Grove Marketing, New Relic and AddThis) who provide system administration services and other third parties we may ask to provide these or similar services from time to time or as otherwise updated in this privacy notice.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent