

Lysander Group Website Privacy Policy

Website Privacy Policy

May 2026

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1. Introduction

Lysander Associates Ltd. (trading as Lysander Group) ("Lysander", "we", "us", "our") is committed to protecting your personal data and respecting your privacy. This Privacy Policy sets out the basis on which we collect, use, store, share, and protect your personal data when you visit our website at www.lysander.com (the "Site"), together with any approved sub-domains.

This policy is issued in compliance with the UK General Data Protection Regulation (UK GDPR) as retained in domestic law by the Data Protection Act 2018 (2018cDPA 2018201d), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended) (2018cPECR201d), and all other applicable UK data protection legislation.

Please read this policy carefully before using our Site. By continuing to use the Site you acknowledge you have read and understood its terms. This policy does not form part of any contract.

2. Who We Are – Controller Details

The data controller for the purposes of UK GDPR is:

Company name: Lysander Associates Ltd.

Trading as: Lysander Group

Registered address: Greenways Studios, Lower Eashing, Godalming, England, GU7 2QF

Email: admin@lysander.com

Regulatory body: Royal Institution of Chartered Surveyors (RICS)

Our designated Data Protection contact is:

Name: Cally Hickman

Email: cally.hickman@lysander.com

Postal address: Mrs C Hickman, Lysander Associates Ltd., Greenways Studios, Lower Eashing, Godalming, England, GU7 2QF

3. Definitions

In this Privacy Policy, the following terms have the meanings set out below:

- ✓ "UK GDPR" means the UK General Data Protection Regulation as incorporated into UK law by the European Union (Withdrawal) Act 2018, as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019.
- ✓ "DPA 2018" means the Data Protection Act 2018.
- ✓ "Personal data" has the meaning given in Article 4(1) UK GDPR – any information relating to an identified or identifiable natural person.
- ✓ "Special category data" means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health, sex life, or sexual orientation.
- ✓ "Processing" means any operation performed on personal data, including collection, storage, use, disclosure, or deletion.
- ✓ "Cookies" means small text files placed on your device when you use certain features of the Site.
- ✓ "Site" means our website at www.lysander.com and any approved sub-domains.
- ✓ "ICO" means the Information Commissioner's Office, the UK's supervisory authority for data protection.

4. Scope of This Policy

This policy applies to all personal data we collect or receive through your use of the Site. It does not apply to:

- ✓ Personal data we process in connection with our professional or client-facing services, which is covered by separate engagement-specific data protection notices.
- ✓ Third-party websites linked from the Site. We have no control over those websites and accept no responsibility for their privacy practices. We recommend you review their privacy policies before providing any personal data.

5. Personal Data We Collect and the Lawful Basis for Processing

5.1 Data You Provide Directly

Where you contact us via the Site or submit an enquiry form, we may collect:

- ✓ Identity data – your name and title.
- ✓ Contact data – your email address, telephone number, and postal address.
- ✓ Message data – the content of your enquiry or correspondence.

Lawful basis: Legitimate interests (Article 6(1)(f) UK GDPR) – to respond to and manage communications with prospective or existing clients and contacts. Where required, consent (Article 6(1)(a) UK GDPR).

5.2 Data Collected Automatically

When you visit the Site, we automatically collect certain technical information via cookies and analytics tools, including:

- ✓ Technical data – your IP address (anonymised where possible), browser type and version, device type, operating system, and referral source.
- ✓ Usage data – pages visited, time spent on pages, links clicked, and navigation patterns.
- ✓ Preference data – language settings and cookie consent preferences.

Lawful basis: Legitimate interests (Article 6(1)(f) UK GDPR) for analytics that help us maintain and improve the Site; consent (Article 6(1)(a) UK GDPR) for non-essential cookies in accordance with PECR.

5.3 Marketing Communications

We will only send you marketing communications where you have given us your express prior consent, or where you are an existing contact and we are promoting materially similar services (the "soft opt-in" under PECR). You may opt out at any time.

Lawful basis: Consent (Article 6(1)(a) UK GDPR) or legitimate interests (Article 6(1)(f) UK GDPR) in the case of the soft opt-in.

5.4 Data We Do Not Collect

We do not knowingly collect or process:

- ✓ Special category personal data (as defined in Article 9 UK GDPR).
- ✓ Personal data relating to children under the age of 18. Our Site is not directed at children and we request that no child submits personal data to us.
- ✓ Data relating to criminal convictions or offences (Article 10 UK GDPR).

6. Cookies and the Privacy and Electronic Communications Regulations

Our use of cookies is governed by PECR as well as the UK GDPR. We categorise cookies as follows:

- ✓ Strictly necessary cookies – essential for the Site to function. These do not require your consent.
- ✓ Analytics and performance cookies – help us understand how visitors interact with the Site. These are only placed with your prior consent.
- ✓ Functionality cookies – remember your preferences. These require your consent unless strictly necessary.
- ✓ Third-party cookies – certain embedded content (e.g. maps, social media plugins) may set cookies from external providers. We do not control those providers' data practices.

Full details, including how to manage or withdraw consent at any time, are set out in our separate Cookie Policy, available on the Site. Withdrawing consent will not affect the lawfulness of any processing carried out before withdrawal.

7. Purposes of Processing and Lawful Bases – Summary

The table below summarises the primary purposes for which we process personal data and the lawful bases we rely on under Article 6 UK GDPR:

- ✓ Operating, maintaining, and improving the Site – Legitimate interests.
- ✓ Responding to enquiries and correspondence – Legitimate interests / Contract performance.
- ✓ Analysing Site usage and visitor behaviour – Legitimate interests (analytics cookies with consent under PECR).
- ✓ Sending marketing communications – Consent / Legitimate interests (soft opt-in).
- ✓ Complying with legal obligations – Legal obligation (Article 6(1)(c) UK GDPR).
- ✓ Defending or pursuing legal claims – Legitimate interests / Legal obligation.

Where we rely on legitimate interests, we have conducted a Legitimate Interests Assessment (LIA) and concluded that our interests are not overridden by your rights and freedoms. You may request a summary of any relevant LIA by contacting us as set out in Section 14.

8. How Long We Retain Personal Data

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, or as required by law. Our standard retention periods are:

- ✓ Website analytics data: up to 14 months, consistent with ICO guidance on analytics tools.
- ✓ Enquiry and contact data: up to 12 months from the date of last contact, unless we enter a professional relationship, in which case our client engagement retention schedule applies.
- ✓ Marketing contact data: until you opt out or withdraw consent, or until 3 years of inactivity, whichever is sooner.
- ✓ Cookie consent records: up to 12 months from the date of consent, or until consent is withdrawn.

At the end of the applicable retention period, personal data will be securely deleted or anonymised. Where anonymisation is not possible, data will be stored in a restricted manner until deletion is feasible.

9. Security of Personal Data

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures (“TOMs”) to protect it against unauthorised access, accidental loss, alteration, disclosure, or destruction. These measures include:

- ✓ Encryption of data in transit using TLS/SSL protocols.
- ✓ Access controls and role-based permissions limiting access to personal data on a need-to-know basis.
- ✓ Regular security assessments and vulnerability testing of our systems.
- ✓ Staff training on data protection and information security obligations.

Notwithstanding these measures, no internet-based transmission is entirely secure. If you have reason to believe your interaction with us is no longer secure, please notify us immediately using the contact details in Section 14.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO without undue delay (and within 72 hours where feasible) in accordance with Article 33 UK GDPR, and will notify affected individuals where required under Article 34 UK GDPR.

10. International Transfers of Personal Data

We are headquartered in England and primarily process your personal data within the United Kingdom. Where personal data is transferred to, or accessed from, a country outside the UK, we ensure that appropriate safeguards are in place in accordance with Chapter V UK GDPR, including:

- ✓ Transfers to countries with a UK adequacy decision issued by the Secretary of State.
- ✓ Use of the UK International Data Transfer Agreement (IDTA) or the Addendum to the EU Standard Contractual Clauses (SCCs) approved for UK use.
- ✓ Other appropriate safeguards where permitted under UK GDPR.

You may request a copy of the transfer mechanism used by contacting us at the details in Section 14.

11. Sharing Personal Data with Third Parties

We do not sell, rent, or trade your personal data. We may share your personal data in the following limited circumstances:

- ✓ Group entities: within our group of related entities where necessary for legitimate business purposes, subject to appropriate intra-group data sharing agreements.
- ✓ Service providers: third-party processors who provide services on our behalf (e.g. web hosting, analytics, email delivery). All processors are subject to data processing agreements requiring them to process data only on our documented instructions and to implement appropriate security measures.
- ✓ Professional advisers: solicitors, accountants, insurers, and other advisers under obligations of confidentiality.
- ✓ Legal and regulatory obligations: where disclosure is required by law, court order, or a regulatory body with jurisdiction, including RICS.
- ✓ Business transfers: in connection with the sale, merger, restructuring, or acquisition of the business, subject to confidentiality undertakings.

We do not share personal data with any third party for their own independent marketing purposes without your explicit consent.

12. Your Data Protection Rights

Under UK GDPR and the DPA 2018, you have the following rights in relation to your personal data. These rights are not absolute and may be subject to conditions and exemptions under applicable law:

- ✓ Right to be informed (Articles 13–14): to receive clear and transparent information about how your personal data is processed – the purpose of this policy.
- ✓ Right of access (Article 15): to request a copy of the personal data we hold about you (a Subject Access Request or "SAR"). We will respond within one calendar month of receipt, free of charge, unless the request is manifestly unfounded or excessive.
- ✓ Right to rectification (Article 16): to request correction of inaccurate or incomplete personal data without undue delay.
- ✓ Right to erasure (Article 17): to request deletion of your personal data where it is no longer necessary for the purpose it was collected, or where you have withdrawn consent and there is no other lawful basis, among other grounds.
- ✓ Right to restrict processing (Article 18): to request that we limit how we use your personal data in certain circumstances, for example whilst accuracy is contested.
- ✓ Right to data portability (Article 20): to receive personal data you have provided to us in a structured, commonly used, and machine-readable format, and to request that we transmit it to another controller, where processing is based on consent or contract and carried out by automated means.
- ✓ Right to object (Article 21): to object to processing based on legitimate interests or for direct marketing purposes. Where you object to direct marketing, we will stop processing immediately. For other legitimate interest processing, we will cease unless we can demonstrate compelling legitimate grounds that override your interests.
- ✓ Rights related to automated decision-making (Article 22): we do not use your personal data for solely automated decision-making, including profiling, that produces legal or similarly significant effects.
- ✓ Right to withdraw consent: where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing prior to withdrawal.

To exercise any of the above rights, please contact us using the details in Section 14. We may need to verify your identity before processing your request. If we are unable to comply with your request, we will explain why.

You also have the right to lodge a complaint with the ICO at any time:

ICO website: www.ico.org.uk

Telephone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

13. Links to Third-Party Websites

The Site may contain 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 those third-party websites and are not responsible for their privacy policies or practices. We encourage you to read the privacy notice of every website you visit.

14. How to Contact Us

For all queries relating to this Privacy Policy, to exercise your data protection rights, or to report a concern, please contact us by:

Email: admin@lysander.com

Post: Lysander Associates Ltd., Greenways Studios, Lower Eashing, Godalming, England, GU7 2QF

Data Protection contact: Cally Hickman – cally.hickman@lysander.com

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in applicable law, regulatory guidance, or our own processing activities. Any material changes will be notified by a prominent notice on the Site. The date at the bottom of this policy indicates when it was last reviewed and updated.

Continued use of the Site following the publication of an updated Privacy Policy constitutes your acknowledgement of the changes. Where required by law, we will seek your consent before processing your personal data under amended terms.

This policy was last reviewed and updated in April 2026. Lysander Associates Ltd. is registered in England. Regulated by the Royal Institution of Chartered Surveyors (RICS).