

Privacy Notice – GFT UK Client Events (Luma Registration)

Who we are and what this notice covers

GFT Financial Ltd ("GFT", "we", "us") is the controller of the personal data you give us when you are invited to, or register for, a GFT event using our Luma event page. Our registered address is 9th Floor, 107 Cheapside, London EC2V 6DN, and you can reach our privacy team at dataprotection.uk@gft.com.

This notice covers only that event registration and the follow-up described below. It does not describe how GFT UK handles personal data in general; for that, see our [privacy notice](#).

What personal data we collect

We collect the following, depending on how you reach the event page:

- **From our own records.** Your name, work email address, company and job title, which we hold in our marketing and CRM systems and use to send you the invitation.
- **When you register.** Your name, email address and any company or role details the form asks for, your confirmations on the form, and whether we approve your request to join.
- **Created by Luma.** Your registration status, the emails Luma sends you for us, and technical data such as IP address and device information that Luma collects when you use its page.
- **Dietary or access requirements, if we ask for them.** These may reveal health or religious information. We use them only to look after you at the event, with your explicit consent given when you provide them.

We do not ask for payment details, because this event is free to attend.

Why we use your data and our lawful basis

We use your data for the purposes below. Registering does not require you to agree to marketing.

Purpose	What we do	Lawful basis (UK GDPR)
Running the event	Review and approve requests to join, confirm your place, send confirmations, reminders and practical information, manage attendance and send a short thank-you after the event	Legitimate interests: hosting events for clients and business contacts (Art 6(1)(f))
Hospitality compliance	Ask you to confirm that you have checked whether your employer requires internal authorisation to accept the invitation	Legitimate interests: meeting our own and our clients' anti-bribery and compliance expectations (Art 6(1)(f))
Dietary and access needs	Cater for and accommodate you at the event	Your explicit consent (Art 6(1)(a) and Art 9(2)(a))
Future events, services and insights	Email you about future GFT events, services and insights,	Your consent (Art 6(1)(a)), and the Privacy and Electronic Communications Regulations

Purpose	What we do	Lawful basis (UK GDPR)
	only if you tick the optional box on the form	
Records, security and legal claims	Keep records of registrations and consents, protect our systems and deal with queries or complaints	Legitimate interests (Art 6(1)(f))

You can withdraw your consent at any time, and you can object to our use of your data for event administration (see your rights below). If you do not tick the optional marketing box, registering does not subscribe you to marketing. If you are already on our mailing list, your existing preferences continue to apply.

Who we share your data with

We do not sell your personal data. We share it only with the following.

- **Luma (Luma Labs, Inc.).** Luma hosts the event page, takes registrations and sends event emails on our behalf. For this, Luma acts as our processor under a data processing addendum and may only use your data on our instructions. Luma also acts as an independent controller for some of its own purposes, for example if you create or use a Luma account or follow hosts on the platform. In that case [Luma's own privacy policy](#) applies.
- **Our CRM and marketing systems (Salesforce and Pardot).** After the event, our UK Marketing team manually transfers registration details from Luma into our CRM. Only people who ticked the optional marketing box are added to marketing lists.
- **GFT Group companies.** Other GFT Group companies that help us run events and help us set up and manage the event page.
- **The event venue.** Your name, if the venue requires a guest list for access or security.
- **Authorities and advisers.** Where the law requires it, or where we need professional advice.

International transfers

Luma Labs, Inc. is based in the United States and may use sub-processors in other countries, so your data can leave the UK. We protect it with the European Commission's Standard Contractual Clauses together with the UK International Data Transfer Addendum issued by the Information Commissioner's Office, which are part of Luma's data processing addendum.

As an international group, GFT may share personal data between GFT Group entities where necessary for business and operational purposes. Such sharing may involve transfers to entities located in other countries. GFT maintains an internal data protection framework to ensure that personal data shared within the Group is protected in accordance with applicable data protection laws.

How long we keep your data

Where	What	How long
Luma	Registration details, including declined requests, and any dietary or access information	We delete them within 6 weeks after the event

Where	What	How long
Salesforce and Pardot, people who ticked the marketing box	Your contact details and marketing preferences	Until you unsubscribe or withdraw consent, and we review them if there has been no contact for 1 year
Salesforce, people who did not tick the marketing box	Your contact details and a minimal attendance record, if any	1 year. We do not add you to marketing lists
Marketing suppression list	Your email address only	Kept so we can honour your unsubscribe request

Your rights

Under UK data protection law you have the right to:

- ask for a copy of your personal data and information about how we use it;
- have inaccurate data corrected;
- have your data deleted in certain circumstances;
- ask us to restrict how we use your data;
- object to our use of your data where we rely on legitimate interests, and object at any time to direct marketing;
- receive the data you gave us on the basis of consent in a portable format; and
- withdraw your consent at any time, without affecting use before you withdrew it.

We do not make decisions about you using solely automated processing. Requests to join are reviewed by people.

To exercise any of these rights, please email dataprotection.uk@gft.com. We will acknowledge your request promptly and respond without undue delay and within the timeframe required by applicable data protection law. Where permitted by law, this timeframe may be extended, for example where a request is complex or multiple requests have been made. We will inform you if an extension is required.

You can unsubscribe from marketing communications at any time using the unsubscribe link in our emails. For personal data that Luma processes for its own purposes, please contact Luma as described in its privacy policy.

Contact us and complaints

If you have questions about this notice or how we use your data, contact the GFT UK privacy team at dataprotection.uk@gft.com, or write to GFT Financial Ltd, 9th Floor, 107 Cheapside, London EC2V 6DN.

If you are unhappy with how we have handled your data, you have the right to complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113. We would appreciate the chance to resolve your concern first.

We may update this notice, for example if our use of Luma changes. The current version is always the one linked from the event page. Version 0.1 (draft), 12 October 2026.