**Privacy Policy**  
**Luminous Bluewaters Consultancy LLC (LBC)**

**1. Introduction**  
Luminous Bluewaters Consultancy LLC (“LBC,” “we,” “us,” or “our”), located at PO Box 99123, First Floor, Office No. 110, Golf Park Building, Al Garhoud, Dubai, United Arab Emirates, is committed to safeguarding the privacy and protection of personal information. This Privacy Policy outlines how we collect, process, and store personal data in accordance with applicable data protection laws, including the DIFC Data Protection Law and other relevant regulations. This Policy applies to all entities within LBC and may be supplemented by jurisdiction-specific addendums.

**2. Data Controller**  
For the purposes of applicable data protection laws, LBC is typically the “data controller” of personal information provided to us. In certain cases, where we process personal data on behalf of clients, we may act as a “data processor.” This Policy applies to personal data collected through our website [lumi-blue.com], mobile platforms, or in the course of providing services to clients.

**3. Collection of Personal Information**  
We collect personal information as part of our business operations, client engagements, and through interactions with our website or mobile app. This includes, but is not limited to:

* **Identity and Contact Information:** Name, job title, employer, contact details, and social media profiles.
* **Verification Data:** Passport details, national ID, tenancy contracts, or publicly available records.
* **Demographic Data:** Date of birth, gender, nationality, and language preferences.
* **Financial Information:** Bank account details, payment records, and billing information.
* **Technical Data:** IP addresses, browser types, website usage, and location data.
* **Engagement Information:** Details of services requested, meetings attended, and events participated in.
* **Health and Accessibility Information:** Dietary preferences or accessibility requirements for events.
* **Other Information:** Any additional information voluntarily provided by you.

**4. How We Collect Personal Information**  
We collect personal information directly from you, through your interaction with our website, and from third-party sources such as clients, employers, regulators, credit agencies, and publicly available records. Data may also be gathered during business development, recruitment, and when providing legal services.

**5. Use of Personal Information**  
Your personal information is processed for the following purposes:

* Providing consultancy services.
* Verifying identities for compliance and risk management.
* Managing client relationships, payments, and invoicing.
* Sending marketing communications, newsletters, and event invitations.
* Ensuring the security of our premises and IT systems.
* Meeting legal and regulatory obligations, including anti-money laundering (AML) and sanctions compliance.
* Conducting internal audits, investigations, and responding to regulatory authorities.

**6. Legal Basis for Processing**  
We process personal data on the basis of:

* Your consent, where required.
* Performance of a contract or to take steps prior to entering into a contract.
* Compliance with legal obligations.
* Legitimate interests pursued by LBC or third parties, except where overridden by your rights.

**7. Data Security and Confidentiality**  
LBC implements robust administrative, technical, and physical security measures to protect personal data from unauthorized access, misuse, or alteration. All employees and third-party service providers are bound by confidentiality obligations.

**8. Sharing and Transfers of Personal Information**  
LBC may share personal information with:

* Affiliates and offices within our network.
* External service providers (e.g., IT services, cloud platforms).
* Regulators, government authorities, and legal entities where required by law.
* Event organizers, professional advisors, and third parties assisting in the delivery of services.  
  Where data is transferred internationally, we ensure appropriate safeguards are in place, in accordance with applicable data protection laws.

**9. Retention of Personal Information**  
Personal data is retained for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulations. This includes legal, tax, and accounting requirements or for the defense of legal claims.

**10. Your Rights**  
Subject to applicable laws, you have the following rights regarding your personal data:

* Access, correction, and deletion of your personal data.
* Objection to or restriction of data processing.
* Data portability, where applicable.
* Withdrawal of consent at any time, without affecting prior processing.
* Lodging a complaint with the relevant data protection authority.

**11. Marketing and Communications**  
You may opt out of receiving marketing communications at any time by contacting us at **info@lumi-blue.com** or using the unsubscribe link in our emails.

**12. Cookies and Tracking Technologies**  
Our website uses cookies to enhance user experience and track visitor analytics. You may adjust your browser settings to disable cookies, though this may limit website functionality. For more information, refer to our Cookie Policy.

**13. Third-Party Websites**  
Our website may contain links to external websites. LBC is not responsible for the privacy practices or content of third-party sites. Users are encouraged to review the privacy policies of those sites.

**14. Updates to this Privacy Policy**  
LBC may update this Privacy Policy from time to time to reflect changes in legal requirements or business practices. Material changes will be communicated through our website. Please review this page periodically for the latest information.

**15. Contact Us**  
For questions or concerns regarding this Privacy Policy or how we handle your personal data, please contact:

Chief Risk & Compliance Officer  
**info@lumi-blue.com**  
Luminous Bluewaters Consultancy LLC  
PO Box 99123  
First Floor, Office No. 110, Golf Park Building  
Al Garhoud, Dubai, United Arab Emirates