

# Lakeshore Privacy Policy

**Last Updated:** 3<sup>rd</sup> June 2025

**Effective Date:** 3<sup>rd</sup> June 2025

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## 1. Introduction

Eagle Alpha (“we”, “us”, “our”) is committed to protecting your privacy and ensuring the security of your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use the Lakeshore platform (“Platform”). We process personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Irish Data Protection Acts 1988–2018.

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## 2. Data Controller

Eagle Alpha, headquartered in Ireland, is the data controller for personal data processed in connection with Lakeshore.

**Contact:**

Eagle Alpha, 9 Baggot Street Upper, D04A6W7, Ireland.

<https://www.eaglealpha.com/contact/>

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## 3. What Personal Data We Collect

We may collect and process the following types of personal data:

- **Account Information:** Name, email address, company, job title, and other registration details.
- **User Content:** Data, files, and other content you upload, transmit, or share via the Platform.
- **Usage Data:** Log files, IP addresses, device information, browser type, access times, and pages viewed.
- **Communications:** Any correspondence or communications with us.
- **Cookies & Tracking:** We use cookies and similar technologies (see our Cookie Policy).

We do **not** intentionally collect or process special categories of personal data unless explicitly provided by you and required for Platform operation.

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## 4. Legal Bases for Processing

We process your personal data only where permitted by law, including:

- **Contractual Necessity:** To provide and maintain the Platform and fulfil our contractual obligations.
  - **Legitimate Interests:** To improve our services, ensure security, and communicate with users, provided these interests are not overridden by your rights.
  - **Consent:** Where required, we will seek your explicit, informed, and unambiguous consent for specific processing activities. You may withdraw consent at any time.
  - **Legal Obligations:** To comply with applicable laws and regulatory requirements.
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## 5. How We Use Your Information

We use your information to:

- Provide, operate, and maintain the Platform.
- Authenticate users and manage accounts.
- Facilitate data transfers between Vendors and Buyers as directed by users.
- Improve, personalize, and expand the Platform.
- Communicate with you regarding updates, support, and security notices.
- Comply with legal obligations and enforce Platform policies.

**We do not access, use, or analyze the content of data shared between Vendors and Buyers except as necessary to operate the Platform or comply with legal requirements.**

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## 6. Information Sharing and Disclosure

- **No Commercial Use or CRM Storage:** We do **not** use or store information about which Vendors send data to which Buyers for any commercial, marketing, or CRM purposes. We maintain strict internal information barriers (“Chinese Wall”) between Platform operations and commercial activities.
  - **Service Providers:** We may share information with trusted third-party service providers who assist us in operating the Platform, under strict confidentiality agreements.
  - **Legal Requirements:** We may disclose information if required by law, regulation, legal process, or governmental request.
  - **Business Transfers:** In the event of a merger, acquisition, or asset sale, your information may be transferred, subject to continued protection consistent with this Policy.
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## 7. International Data Transfers

Your personal data may be transferred to and processed in countries outside the European Economic Area (EEA). Where such transfers occur, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or adequacy decisions, to protect your data as required by GDPR.

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## 8. Data Security

We implement appropriate technical and organisational measures, including encryption, access controls, and regular security assessments, to ensure a level of security appropriate to the risk, as required by Article 32 GDPR. Access to personal data is limited to authorised personnel only as necessary.

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## 9. Data Retention

We retain your information only as long as necessary to fulfil the purposes outlined in this Policy, comply with legal obligations, resolve disputes, and enforce agreements. You may request deletion of your personal information by contacting us (see Section 12).

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## 10. Your Rights Under GDPR

As a data subject under GDPR, you have the right to:

- **Access:** Request a copy of your personal data.
- **Rectification:** Request correction of inaccurate or incomplete data.
- **Erasement:** Request deletion of your data (“right to be forgotten”) in certain circumstances.
- **Restriction:** Request restriction of processing in certain cases.
- **Objection:** Object to processing based on legitimate interests.
- **Portability:** Request transfer of your data to another provider.
- **Withdraw Consent:** Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal.
- **Lodge a Complaint:** With the Irish Data Protection Commission ([www.dataprotection.ie](https://www.dataprotection.ie)).

To exercise your rights, contact us at <https://www.eaglealpha.com/contact/>.

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## 11. Children’s Privacy

The Platform is not directed to children under 16. We do not knowingly collect personal data from children under 16 without appropriate consent as required by Irish law.

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## 12. Contact Us

For questions, concerns, or requests regarding this Privacy Policy or your information, please contact:

**Eagle Alpha**

9 Baggot Street Upper, D04A6W7, Ireland

<https://www.eaglealpha.com/contact/>

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## 13. Changes to This Policy

We may update this Privacy Policy from time to time. We will notify you of material changes by posting the new Policy on the Platform or by other means. Continued use of Lakeshore after changes constitutes acceptance of the updated Policy.

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