

Record of Processing entry

Ready to paste into your Article 30 record · lumi fields completed · version 1.0, 3 September 2026

What this is. The row your Record of Processing Activities needs for lumi, already written, in the order the Article 30(1) list uses. Copy it into your own template and edit.

Anything **shaded** is yours to complete — we do not know your controller details, your internal owner, or your review cycle.

A note on scope. The reward data itself is organisation-level and is not personal data, so strictly it does not belong in an Article 30 record at all. The entry below covers the personal data that genuinely exists: the accounts of the colleagues who use the platform. Some organisations prefer to record the whole supplier relationship in one row regardless — if that is your practice, the description in the first field covers both.

ENTRY

Name of processing activity	Reward benchmarking with lumi (Lumi HR Ltd)
Description	Nominated employees hold accounts on lumi, a UK reward-benchmarking platform, and submit organisation-level reward policy information through a structured questionnaire. No employee personal data is submitted; the questionnaire contains no free-text field. The personal data processed is the account data of the nominated users.
Controller	Your organisation's name, address and contact details
Data protection officer	Your DPO's name and contact details
Internal owner	Usually the Reward or HR lead
Purposes of processing	To compare the organisation's reward policies against an anonymised panel of UK organisations, and to produce cited internal reporting from that comparison. Account data is processed to authenticate users and attribute actions within the organisation's workspace.
Lawful basis	Ordinarily legitimate interests, or performance of the employment contract, for nominating employees as platform users — the reward data itself is not personal data, so no basis is engaged for it
Categories of data subject	Employees of the organisation nominated as platform users. Typically one to three people.
Categories of personal data	Work email address; display name; password (stored as a bcrypt hash); session and invitation tokens; a log of actions taken within the workspace.
Special category or criminal offence data	None.
Recipients	Lumi HR Ltd (the platform operator). Its sub-processors: Amazon Web Services (hosting and encrypted backups, United Kingdom); Anthropic PBC (narrative text generated from aggregate figures, United States); Postmark, Wildbit LLC (transactional email, United States). No other recipients. Data is not sold or disclosed to third parties for their own purposes.

Transfers outside the UK	Yes — to the United States, to Anthropic PBC and Postmark. Safeguard: Standard Contractual Clauses with the UK International Data Transfer Addendum. Benchmark data is hosted in the United Kingdom (AWS London region).
Retention	Account data: for as long as the account exists. Contributed organisation data: for the duration of membership; on written request it is deleted from live systems within 30 days and excluded from subsequent benchmark snapshots. Aggregates already distributed, which do not identify the organisation, are not recalled. Session and invitation tokens expire automatically.
Technical and organisational security measures	Multi-factor authentication enforced for every user (a browser the user chooses to trust may skip the second factor for up to 30 days, on a single-use rotating token); passwords stored as bcrypt hashes; sign-in attempts throttled; encryption in transit (TLS with HSTS) and at rest; tenant isolation enforced at the server rather than in the interface; least-privilege administrative access; nightly encrypted off-site backups with a tested and evidenced restore; audit logging of administrative and sharing actions; minimum-cell suppression so no figure resting on fewer than five organisations is ever disclosed.
Certifications	Cyber Essentials certified — Periculo under IASME, certificate 000b5bc2-a54c-4f22-94ca-2d6188f58ddb, 7 September 2026; recertification due 7 September 2027. ISO 27001 and SOC 2 are not held. No independent penetration test has been commissioned.
DPIA	Reference your DPIA if you completed one — a draft with the lumi sections pre-filled is available at lumih.co.uk/trust
Date of entry / next review	Your dates

SUPPORTING DOCUMENTS

Data Sharing Agreement (DPA)	lumihhr.co.uk/legal/dpa
Data Contribution Terms	lumihhr.co.uk/legal/data_contribution
Privacy Notice	lumihhr.co.uk/legal/privacy
Sub-processor List	lumihhr.co.uk/legal/subprocessors
AI Insights Terms	lumihhr.co.uk/legal/ai_insights
The full question register	lumihhr.co.uk/register — every question we ask, no account needed
Data minimisation attestation	On request from dpo@lumihhr.co.uk

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Fields describe the service as operated on 3 September 2026 and were verified against the running systems on that date. Offered to reduce duplicated effort; not legal advice. Your record remains yours to maintain.