

## **PRIVACY POLICY**

### **BACKGROUND**

This Privacy Policy is issued by **Aglionby ADR Limited** (referred to as “**the Firm**”, “**we**”, “**us**” and “**our**” in this Privacy Policy), that operates in the United Kingdom.

Your information will be held by the Firm. This privacy notice is to let you know how the Firm promises to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client, and the choices you give us about what marketing you want us to send you. This notice also tells you about your privacy rights and how the law protects you.

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#### **1. ABOUT THIS POLICY**

##### **1.1 Scope of this policy**

This Privacy Policy relates to our use of any personal information we collect from you via the following services:

- any Firm website that links to this Policy (“**Websites**”); or
- social media or Firm content on other websites; or
- whilst providing agreed services to you or receiving services from you; or

- as your employer.

It also relates to our use of any personal information we collect through other means, such as

- Email
- In person
- Other third party sources.

We've approached our Privacy Policy with brevity and clarity in mind. If you would like any additional information or explanation or would like us to answer any questions you may have please contact us using the details provided (see the "HOW TO CONTACT US" section below).

## 1.2 Policy updates

We will keep this Privacy Policy under regular review to make sure we're being transparent about how we use your personal information. Any changes to our Privacy Policy will be reflected at <https://www.aglionbyadr.com>. If we make any material changes in the way we collect, use and/or share your personal information, we will notify you by posting notice of the changes in a clear manner on our website.

## 2. ABOUT THE FIRM

### 2.1 Who are we?

**Aglionby ADR Limited** operates in the United Kingdom. You'll find our registered address below. We are a law firm authorised by the Solicitors Regulation Authority.

### 2.2 Who's the Data Controller?

For the purposes of data protection laws, we are the "**data controller**" of all personal information that we collect, use and/or otherwise process about you under this Privacy Policy.

## 3. WHAT INFORMATION DO WE GATHER AND HOW DO WE COLLECT IT?

### 3.1 What types of information do we collect about you?

The type of information we collect about you depends on the nature of your interactions with us. Depending on the circumstances, we may receive or collect personal information about you when you contact the Firm for example by doing any of the following:

*Data you give to us:*

- When you request our services.
- When you talk to us on the phone or in person.
- When we are "out on the road".
- When you use our websites or any mobile device apps.
- In emails and letters.
- In client surveys.
- When you sign up for or request that we send you e-alerts or other legal or marketing materials.

- When you apply for a job with the Firm.

*Data we collect when you use our services:*

- Information that relates to the legal services that we provide to you, to enable us to fulfil those services.
- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet or any mobile and telephone services. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

*Data from third parties we may work with:*

- Employers / Recruitment consultants.
- Government and law enforcement agencies.

### **3.2 Personal information about others**

We may collect information from you about others, such as members of your business, household or family. If you give us information about another person it is your responsibility to ensure and confirm that:

- you have either told the individual who we are and how we use personal information, as set out in this Privacy Policy; and have permission from the individual to provide that personal information (including any sensitive personal data) to us and for us to process it, as set out in this Privacy Policy; or
- you are otherwise satisfied that you are not in breach of data protection legislation by providing the information to us.

## **4. WHEN DO WE NEED TO COLLECT YOUR SENSITIVE INFORMATION?**

In certain circumstances, we will collect information that is deemed sensitive. For example:

- information about your health;
- information about any criminal record you may have;
- trade union membership details;
- data concerning a natural person's sex life or sexual orientation.

We seek to limit any sensitive personal data that we collect and, unless we have other specific lawful reasons to use this information (such as in an emergency situation), we will ask for your consent to collect it.

## **5. HOW THE LAW PROTECTS YOU**

Your privacy is protected by law. This section provides an overview of how that protection works.

Data protection law states that we are only allowed to use personal information if we have a proper reason to do so. This includes sharing it outside the Firm. The law states that we must have one or more of the following reasons:

- when you consent to it; or
- to fulfil a contract we have with you; or
- when it is our legal duty; or
- when it is in our legitimate interest.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is best or right for you. If we rely on our legitimate interest, we will tell you what that is. The section below (“How We Use Your Information”) contains a list of the ways in which we may use your personal information, and the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

## 6. HOW WE USE YOUR INFORMATION

We will only use your personal data fairly and where we have a lawful reason to do so. We are allowed to use your personal data if we have your consent or another legally permitted reason applies. These include to fulfil a contract we have with you, when we have a legal duty that we must comply with, or when it is in our legitimate business interest to use your personal data. We can only rely on our legitimate business interest if it is fair and reasonable to do so. We may use information:

Uses of personal data	The Firm’s lawful basis for using your personal data
<ul style="list-style-type: none"> <li>• To provide guidance and information on our services, to respond to client enquiries, to manage and administer our business relationships, including to communicate with our clients, their employees (if any) and representatives, to administer client billing and payments, to collect and recover money that is owed to us and to keep records.</li> </ul>	<p>To fulfil our contract with our client(s) and to comply with legal and regulatory obligations including accounting, tax and data protection.</p>
<ul style="list-style-type: none"> <li>• To undertake due diligence on new clients and suppliers.</li> <li>• To help us identify, investigate, report and seek to prevent financial crime.</li> <li>• To comply with laws and regulations that apply to us..</li> </ul>	<p>To comply with our legal and regulatory obligations including compliance with anti-money laundering legislation, crime prevention and fraud.</p>
<ul style="list-style-type: none"> <li>• To provide information services to clients and potential clients, including by email updates and newsletters and to invite you to events that we may organise from time to time. This may include surveys to obtain feedback from you.</li> </ul>	<p>Where you have consented and expressed a preference to receive marketing communications; or if we feel it is appropriate and relevant to our business relationship with you.</p>

<b>Uses of personal data</b>	<b>The Firm's lawful basis for using your personal data</b>
<ul style="list-style-type: none"> <li>To develop and carry out marketing activities and to show you information that is of interest to you, based on our understanding of your preferences (we combine information you give us with information we may receive about you from third parties to help us understand you better).</li> </ul>	
<ul style="list-style-type: none"> <li>To run our business in an efficient and proper way (e.g. audit, managing our business capability, evaluating and recruiting personnel, managing risk for us and our clients, finances, planning, communications with our own service providers and clients, corporate governance, responding to complaints and seeking to resolve them).</li> </ul>	On the basis of our legitimate interests for the efficient operation of our business.
<ul style="list-style-type: none"> <li>To maintain lists to ensure that you do not receive communications from us where you have objected to this or have unsubscribed.</li> </ul>	To safeguard your rights and comply with our legal obligations.
<ul style="list-style-type: none"> <li>To optimise our website. To collate information on how you interact with us and our services so that we can improve this if felt necessary.</li> </ul>	Where we have consent from you or on the basis of our legitimate interests to operate and present an effective and convenient website to our website users.
<ul style="list-style-type: none"> <li>To exercise our rights contained in agreements or contracts, website terms of use and other terms and conditions of business. This may include complying with contracts of employment and agreements with any consultants and other service providers/suppliers that we may use.</li> </ul>	Fulfilling contracts or to protect our legal interests.
<ul style="list-style-type: none"> <li>In certain circumstances, to ensure the security of our services, offices and people, including to protect against, investigate and deter fraud, unauthorised or illegal activities, systems testing, maintenance and development.</li> </ul>	On the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so.
<ul style="list-style-type: none"> <li>Sharing personal data if we decide to sell or transfer part of all of our business.</li> </ul>	When needed to comply with our legal obligations and to facilitate the transaction.
<ul style="list-style-type: none"> <li>For other purposes that we have identified when we collect the information (such as processing a job</li> </ul>	Where we have your consent or on the basis of our legitimate interest to recruit new employees or contractors.

Uses of personal data	The Firm's lawful basis for using your personal data
application whether directly or via an agent or recruiter).	

### Groups of personal information

We collect and use lots of different types of personal data. Personal data is any information that relates to you and that identifies you either directly from that information or indirectly, by reference to other information that we have access to. The personal data that we collect, and how we collect it, depends upon how you interact with us. Categories of personal data that we collect include:

<i>Contact</i>	Such as your name, email address and telephone number.
<i>Socio-Demographic</i>	<i>This includes details about your work or profession, nationality and education.</i>
<i>Contractual</i>	<i>Details about the products or services we provide to you.</i>
<i>Transactional</i>	<i>Details about payments to and from clients.</i>
<i>Locational</i>	<i>Data we get about where you are, such as may come from your mobile phone or the address where you connect a computer to the internet.</i>
<i>Communications</i>	<i>What we learn about you from letters, emails, conversations between us, feedback and survey responses.</i>
<i>Open data and public records</i>	<i>Details about you that are in public records such as UK Companies House, the UK Electoral Register, and information about you that is openly available on the internet.</i>
<i>Usage data</i>	Other data about how you use our products and services.
<i>Documentary data</i>	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport or driving licence if we ask you to verify your identity.
<i>Special types of data</i>	<p>The law and other regulations treat some types of personal information as special, such as the following types. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic and bio-metric data</li> <li>• Health data including gender</li> <li>• Criminal convictions and offences.</li> </ul>

<i>Consents</i>	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you.
<i>Financial</i>	Billing and financial information such as billing address, bank account and payment information.
<i>Identity Documents</i>	Passport, driving licence or other photographic identity details or a number or code given to you by a government to identify who you are, such as a National Insurance number.

## **7. HOW WE SHARE YOUR INFORMATION OUTSIDE OF THE FIRM**

7.1 If you request an estimate for legal services, your personal information may be shared with employees and consultants working on behalf of the Firm, but its use will be limited to the performance of their duties and in line with the reason for processing. All staff are required to keep that information confidential and are not permitted to use it for any purposes other than to provide legal services, to deal with requests which are submitted to us or for such other purposes as are set out in this privacy policy. Your information may also be disclosed when we believe in good faith that the disclosure is:

- required by law;
- to protect the safety of our employees, the public or our property;
- required to comply with a judicial proceeding, court order or legal process;
- in the event of a merger, asset sale, or other related transaction; or
- for the prevention or detection of crime (including fraud).

We may also share your personal data when you have consented to us doing so.

We may disclose your information to third party suppliers or service providers to conduct our business, for example, to assist in managing and storing data, provide data analytics, conduct market research and to communicate with you effectively.

Where we do share your information with third parties we will, wherever possible, require them to maintain appropriate security to protect your information from unauthorised access or processing.

### **7.2 If you choose not to give personal information**

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It could mean that we have no option but to cancel our service to you.

Any data collection that is optional would be made clear at the point of collection.

### 7.3 **Our service providers and suppliers**

We are based in the United Kingdom. If we send personal information to countries outside the United Kingdom, we will ensure that there will be a contract in place to make sure the recipient protects the data to the same standard as the UK. This may include following international frameworks for making data sharing secure. We will only transfer your personal data outside of the UK under the following circumstances:

- where the transfer is to a country or other territory which has been assessed by the UK government as ensuring an adequate level of protection for personal data;
- with your consent or
- on the basis that the transfer is compliant with the GDPR and other applicable laws.

## 8. **MARKETING**

### 8.1 **When you'll hear from us**

At present, we do not undertake direct marketing. However, we may in the future use your personal information to send you marketing by post, by phone, through social media, by email and by text. We may also use your personal information to help us identify, tailor and package products and services, determine pricing and offer discounts that we believe may be of interest to you.

We can only use your personal information to send you marketing material if we have your permission or a legitimate interest as described above.

If you don't want to receive emails from us, you can click on the 'unsubscribe' link that appears in all marketing emails we send. If you don't want to receive texts from us you can tell us by contacting us at any time. Otherwise, you can always contact us to update your contact preferences.

You have the right to object to direct marketing and profiling (the automated processing of your information to help us evaluate certain things about you, for example, your personal preferences and your interests) relating to direct marketing. Please see the section about your rights for more details.

### 8.2 **Opting out of or withdrawing your consent in relation to marketing**

If you no longer want to hear from us, you can opt out or unsubscribe by:

- following the "unsubscribe" link contained in any marketing communications that you receive from us; or
- by contacting us on the details given in section 13 below headed "HOW TO CONTACT US".

### 8.3 **Third parties and marketing**

We might rely on third parties to help us manage our marketing communications, but we won't share your information with any third parties for their marketing purposes unless you agree to our doing so.



## **9. OUR SITE AND COOKIES**

### **9.1 What we collect when you interact with our sites and apps**

As you may already know, most websites collect certain information automatically about the way in which you interact with them. This might include your IP address, geographical location, device information (such as your hardware model, mobile network information, unique device identifiers) browser type, referral source, length of visit to the site, number of page views, the search queries you make, and similar information.

This information will be collected by us or by a third party site analytics service provider and will be collected using cookies.

As we've described above, we use this information to save your settings, such as the last service you searched for so you can find it easily the second time, help improve our functionality and services, run diagnostics, analyse trends, track visitor movements, gather broad demographic information and personalise our services.

### **9.2 What do we mean by "cookies"?**

Cookies are small amounts of information in the form of text files that we store on the device you use to access our site or our marketing communications. Cookies allow us to monitor your use of our services and improve them. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie you will not be able to purchase products or other services that may be offered via our site.

We also use cookies for site analytics purposes and to monitor how clients interact with and receive our marketing communications (for example if you open a marketing communication and/or click on any of our offers). We use this information to try to improve the relevance and tone of our future communications to ensure we're serving you as best as we can.

If you don't want cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings, please consult the "Help" section of your internet browser or visit <http://www.aboutcookies.org>. Please note that if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the site.

## **10. YOUR RIGHTS**

### **10.1 Your data protection rights**

Under data protection laws you have various rights in respect of the personal information that we hold about you, including:

- you can require us to update or correct any inaccurate personal data, or to complete any incomplete personal data, concerning you. If you do, we will take reasonable steps to check the accuracy of, and correct the information. Please let us know if any of your information changes so that we can keep it accurate and up to date;
- you can require us to stop processing your information for direct marketing purposes. If you withdraw your consent, we may not be able to provide certain products or services to you; and
- you have the right to object to our use of your personal data more generally.

You may also have the right, in certain circumstances to:

- be provided with a copy of any personal data that we hold about you, with certain related information. This is known as a Subject Access Request. There are exceptions to this right; for example, where information is legally privileged or if providing you with the information would reveal personal data about another person;
- to require us, without undue delay, to delete your personal data;
- to "restrict" our use of your information, so that it can only continue subject to restrictions; and
- to require personal data which you have provided to us and which is processed by using automated means, based on your consent or the performance of a contract with you, to be provided to you in machine readable format so that it can be "ported" to a replacement service provider.

Please note that we reserve the right to retain certain information for our own record-keeping (for example, to ensure that you do not receive marketing communications that you have opted-out of receiving) and to defend ourselves against any claims. We may also need to send you service-related communications about the services that we provide to you even when you have requested not to receive marketing communications.

## 10.2 How to exercise your rights

- You can exercise your rights by contacting us using the details in the "HOW TO CONTACT US" section below, or by ticking the applicable boxes on forms that we use to collect your information, or to tell us that you don't want to participate in marketing.
- If you wish to remove your information from our marketing circulation lists, which include receiving marketing emails, you can unsubscribe by scrolling to the bottom of the email and clicking the 'unsubscribe' link.
- We will comply with your requests unless we have a lawful reason not to do so.
- We may need you to provide satisfactory proof of your identity. This is to ensure that your personal data is disclosed only to you.

## 11. HOW WE LOOK AFTER YOUR INFORMATION

11.1 We are committed to protecting the confidentiality and security of the information that you provide to us. We put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information. By way of example we:

- Ensure the physical security of our offices.
- Ensure the physical and digital security of our equipment, devices and systems by mandating appropriate password protection, encryption and access restrictions.
- Ensure appropriate access controls so that access to your information is only granted to those of our people that need to use it in the course of their work.
- Employ expert IT consultants to continuously monitor the security of our systems.
- Maintain internal policies and procedures and deliver data protection training to make sure our staff understand their responsibilities in looking after your information and take appropriate measures to enforce these responsibilities.

However no information system can be 100% secure and we are therefore unable to guarantee the absolute security of your information. Further, we are not responsible for the security of any information that you may transmit to us over networks that are not under our control, including the internet and wireless network.

#### 11.2 **Links to other sites and resources**

- Our website may from time to time contain content and links to other sites that are operated by third parties. You should note that we do not control these third party sites or the cookies that such third parties operate and this Privacy Policy will not apply to them. You should ensure that you consult the Terms of Use and Privacy Policy of the relevant third party site to understand how that site collects and uses your information and to establish whether and for what purposes they use cookies.
- You should also be aware that communications over the internet, such as e-mails, are not secure unless they have been encrypted.

#### 12. **HOW LONG WE KEEP YOUR INFORMATION FOR**

We do not keep your personal data for any longer than is necessary to fulfil the purpose for which we collected it, or to comply with any legal, regulatory or reporting obligations or to assert or defend against legal claims. We will generally keep your data for at least six years for one of these reasons:

- To comply with our legal and/or regulatory obligations.
- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than six years if we cannot delete it for legal or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

#### 13. **HOW TO CONTACT US**

If you have any questions about this Privacy Policy or the ways in which we handle your personal information or if you want to make a subject access request, please contact us at:

The Data Protection Officer  
Aglionby ADR Limited  
7 Bell Yard  
London  
WC2A 2JR

Email: [andrew@aglionbyadr.com](mailto:andrew@aglionbyadr.com)

Telephone: 07587 155 817

However, if you remain dissatisfied with our response, you have the right to take the matter up with the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can contact the Information Commissioner via the ICO website at <https://ico.org.uk/global/contact-us>

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