



PADDLE & COCKS LLP

Privacy Notice for Website Visitors

Paddle & Cocks LLP respects your privacy and is committed to protecting your personal data. This Privacy Notice informs you how we look after your personal data when you visit our website and about your privacy rights.

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1. Controller

Paddle & Cocks LLP is the controller and responsible for your personal data.

Paddle & Cocks LLP is a limited liability partnership with registration number OC419377.

Our head office is at Charles House, 18-21, Charles Street, Truro, Cornwall, TR1 2PQ and our main phone number is 01872 672072.

We have appointed a data protection manager (DPM) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact our DPM, Amanda Williams, at amanda.williams@paddleandcocks.co.uk.

2. How do we use your personal data and what is our legal basis

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Device data

We collect and use data about your device when you use our website but only if you have consented to our use of cookies.

- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website.

Contact Us form

We collect and use data when you fill out our 'Contact Us' form and we use this data with your consent, in order to reply to your message.

- First name and last name
- Email address
- Your message

Marketing Data

If you are a client or have contacted us about becoming a client, we will send you marketing information under the legal basis of legitimate interest. You may, of course, unsubscribe at any time.

3. Who we share website visitor's information with

We share visitor data with the following, when required:

- The police or other law enforcement agencies if we have to by law or court order;
- Our legal advisors;
- Our insurance providers; and
- Our software and cloud service providers.

4. International transfers

We do not transfer your data outside of the UK.

5. Data security

We are committed to keeping your personal data secure and we have implemented appropriate information security policies, rules and technical measures to protect it from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss.

All of our partners, employees, consultants, workers and data processors (i.e. those who process your personal data on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of such personal data.

6. Retention of personal data

If you make an enquiry and then do not engage our services, we will retain your personal data for one year, in case you make another enquiry. We retain systems data from your device for one year in case of any issues. The legal basis for both of these is legitimate interest.

If you make an enquiry and become a client, your enquiry becomes part of your client file.

7. How to access your information and your other rights

You have the following rights in relation to the personal data we hold about you:

Your right of access

If you ask us, we'll confirm whether we're processing your personal data and, if necessary, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

Your right to rectification

If the personal data we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

Your right to erasure

You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal data with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances,

such as where you contest the accuracy of that personal data or you object to us. If you are entitled to restriction and if we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

Your right to data portability

You have the right, in certain circumstances, to obtain personal data you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

Your right to object

You can ask us to stop processing your personal data, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal data for direct marketing purposes.

Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time.

Your right to lodge a complaint with the ICO

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal data, you can report it to the Information Commissioner's Office (**ICO**) (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

8. Changes to this Privacy Notice

To ensure that you are always aware of how we use your personal data we will update this Privacy Notice from time to time to reflect any changes to our use of your personal data. We may also make changes as required to comply with changes in applicable law or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes. However, we encourage you to review this Privacy Notice periodically to be informed of how we use your personal data.