

COLLYER BRISTOW PRIVACY NOTICE

Collyer Bristow is a law firm and provides legal advice and assistance to its clients. It is regulated by the Solicitors Regulation Authority. The personal data that we process to provide these services relates to our clients and other individuals as necessary, including staff and suppliers' staff.

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you contract with us, whether as a client or a supplier, or visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

We will ensure that all staff who handle personal data on our behalf are aware of their responsibilities under this privacy notice and other relevant data protection and information security policies, and that they are adequately trained and supervised.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. **IMPORTANT INFORMATION AND WHO WE ARE**
2. **THE DATA WE COLLECT ABOUT YOU**
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1. **IMPORTANT INFORMATION AND WHO WE ARE**

Purpose of this privacy notice

This privacy notice aims to give you information on how Collyer Bristow collects and processes your personal data in its dealings with you.

We do not knowingly collect data relating to children otherwise than from an authorised parent or guardian.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Collyer Bristow is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed data privacy managers (DPM) who are jointly 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 the DPM using the details set out below.

Contact details

Our full details are:

Full name of legal entity:	Collyer Bristow LLP
Name or title of DPM:	Patrick Wheeler, Howard Ricklow, Lee Baxter
Email address:	data@collyerbristow.com
Postal address:	140 Brompton Road, Knightsbridge, London, SW3 1HY
Telephone number:	+44 20 7242 7363

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website includes links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections allows third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Client Matter Data** includes details about the matters on which we are advising you including payments to and from you and other details of the services that we are providing to you.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Profile Data** includes your user name and any password, your interests, preferences, feedback and survey responses.
- **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 systems and platform and other technology on the devices you use to access our website.

We may need to collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Very

occasionally we may need to collect information about criminal convictions and offences. Should we need to obtain, record or use such data then we will do so on the basis that it is necessary for the purposes of establishing, exercising or defending a legal claim. We may, in certain circumstances, require the explicit consent of the data subject. Should such a need arise we will contact you. In such cases we will apply enhanced security measures to ensure that the privacy of the data is maintained and will only process it in accordance with the purposes as set out in paragraph 4 below.

If you fail to provide personal data

Where we need to collect and process personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cease to act for you or cancel a service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** We collect your Identity, Contact and Financial Data when you fill in forms or correspond with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - become our client or start a new matter with us;
 - subscribe to our publications;
 - request marketing to be sent to you; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we automatically collect Technical Data and, if you consent to us doing so, we also collect about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy (www.collyerbristow.com/privacy-cookies) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Contact, Financial and Client Matter Data from providers of technical, payment and delivery services;
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register; and
 - Social media platforms, including Linked In, Facebook, Instagram, Twitter.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide or in preparation for providing our legal services to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than when we need to process special category data (as explained in paragraph 2 above) or in relation to sending certain marketing communications to you via email in cases where we are not relying on the basis of legitimate interest. You have the right to withdraw consent to marketing at any time by unsubscribing from our emails (via the preference centre in the footer) or contacting our DPM via

data@collyerbristow.com. You may also withdraw your consent for us to process special category data at any time, but if you do so then the consequences are set out below.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that, as detailed in the table below, we sometimes process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our DPM if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the following table:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To manage our relationship with you which will include: (a) Providing legal advice and related services (b) Collect and recover money owed to us (c) Notifying you about changes to our terms or privacy notice (d) Asking you to provide feedback or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about advice or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests (to develop our services and grow our business)
To provide you with copies of our promotional literature that are readily downloadable from our website to those who consent to joining our marketing mailing lists	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Your consent (which you can withdraw at any time)

Identity verification

Any personal data received for the purpose of identity verification will be processed only for the purposes of preventing money laundering or terrorist financing unless:

- use of the data is permitted by or under an enactment other than the Money Laundering Regulations; or
- we have obtained the consent of the data subject to the proposed other use of the data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Withdrawing consent

You can ask us to stop sending you marketing messages at any time by contacting our DPM via data@collyerbristow.com.

Where you withdraw your consent to receiving these marketing messages, this will not apply to personal data provided to us as a result of any client matter that we have undertaken for you or in the course of a service we have provided to you.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our DPM via data@collyerbristow.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

In the course of working with you and for the purposes of the contract we have with you and/or the enforcement of legal rights, we may have to share your personal data with certain Third Parties as set out in the Glossary.

We aim to require all Third Parties to respect the security of your personal data and to treat it in accordance with the law. We direct our Third-Party service providers not to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Some of our external Third Parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we aim to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- your personal data is transferred to countries that have been deemed to provide an adequate level of protection for personal data under the UK's adequacy regulations issued under the Data Protection Act 2018;

- the transfer of your personal data has been authorised by the relevant data protection authority; or
- we have entered into a contract with the organisation with which we are sharing your information on terms approved by the UK government and supplemented by additional measures to ensure your information is subject to the same protection as it has within the UK.

If none of the above is possible, we will only transfer your personal data out of the UK where derogations under applicable data protection legislation allows us to do so, in which case we will inform you of the relevant derogation prior to or at the time of making that transfer.

Please contact us at data@collyerbristow.com if you would like further information about the specific mechanism used by us when transferring your personal data out of the UK and the destination countries to which your personal data is transferred.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us in respect of your data by contacting our DPM.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Client Matter Data) for at least seven years after they cease being clients for tax and regulatory purposes.

In some circumstances you can ask us to delete your data: see Request erasure for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. See below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request the transfer of your personal data*
- *Request restriction of processing your personal data.*
- *Right to withdraw consent.*

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. While it is not a requirement that an individual must make a request for access to their personal data in writing, it is helpful if they do so. Individuals are therefore encouraged to use the Data subject access request form at the end of this notice.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best advice and service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our DPM via data@collyerbristow.com.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to including transferring your personal data to a Government or regulatory body.

THIRD PARTIES

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, experts, auditors and insurers who provide consultancy, legal, expert witness, insurance and accounting services.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you, and does not apply to personal data that we only hold in hard copy (e.g. paper records).
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

This Notice was last updated on 18 August 2022.

Data subject access request form

Please complete this form if you wish to request access to your personal data. You do not have to use this form, but it will help us to deal with your request as quickly and effectively as possible if you do.

You can also use this form if you are requesting access to personal data on behalf of someone else. In that case, we will need you to confirm you have that person's authority to ask for access to their data.

If you have any questions about this form or your request, please contact one of our data privacy managers (Lee Baxter, Howard Ricklow and Patrick Wheeler): t: +44 20 7242 7363, e: data@collyerbristow.com.

1 ABOUT YOU

Please provide the following information. If you have an account number or other reference number, please provide it.

Full name	
Address	
Contact details	
Client/matter number OR National Insurance number OR any other relevant reference number	

For security reasons, we cannot respond to a request unless we have confirmed your identity. Please provide a certified copy driving licence or passport, plus a utility bill or other proof of address. If you are unable to provide such information please let us know what documentation you are able to provide that verifies your identity and address.

2 WHOSE PERSONAL DATA ARE YOU REQUESTING?

Please provide the following information. If you are making this request on behalf of someone else, we will need this information before we can supply you with the data you are asking for.

Are you requesting access to your own personal data?	<input type="checkbox"/> Yes, please go to section 3 below. <input type="checkbox"/> No, please complete the rest of this section of the form.
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If you are not requesting access to your own personal data, please provide the following information about the person on whose behalf you are making this request:

Full name	
Address	
Contact details	
Client/matter number OR National Insurance number OR any other relevant reference number	
Age (if under 16)	

We cannot respond to your request until we also receive satisfactory confirmation of the identity of the person on whose behalf you are making this request. Please provide a certified copy driving licence or passport, plus a utility bill or other proof of address of the data subject(s). If you are unable to provide such information please let us know what documentation you are able to provide that verifies the identity and address of the data subject(s).

Please provide a copy of your legal authority to make this request. This might be a signed letter of authority from the person on whose behalf you are making this request, a power of attorney or confirmation that you are their legal representative.

3 WHAT DATA ARE YOU REQUESTING?

Your rights to request access to personal data and other information are set out in our Privacy Notice which is available on our website. Please describe what personal data and other information you are requesting, in particular if you are asking for specific documents or information.

Description of the personal data and information requested including details of any specific documents or information you're asking for (where relevant)	
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Please give as much detail as possible about where the data might be located and any other relevant information. You do not have to provide this information, but doing so will help us to deal with your request as quickly and effectively as possible.

Location of data, e.g. any particular departments or parts of the organisation you have dealt with (if known)	
Relevant time periods, e.g. when we are likely to have obtained your data (if known)	

Dates of any particular correspondence, meetings or telephone calls (if known)	
The name(s) of people you have dealt with within our organisation (if known)	
Any other relevant information you can think of that might help us respond to your request	

4 SIGNATURE

Please check the information you have provided and sign below.

Signed	
Date	

Please send this form and the documents we have asked you to provide to: Data Privacy Managers, 140 Brompton Road, Knightsbridge, London, SW3 1HY or email our data privacy managers using the email address provided above.

If you are making this request by email, we will provide the information to you in an electronic format unless you ask us not to. If you wish to receive your information in a different format, e.g. hard copy, please let us know in the box below.

[Details to be inserted here]