

PRIVACY POLICY – FS REG LIMITED (“FSREG”)

29 July 2020

1. INTRODUCTION

FSREG is committed to protecting the privacy of individuals whose data we process and to complying with our obligations under relevant data protection and privacy laws including the General Data Protection Regulation (Regulation 2016/679) (the “**GDPR**”).

This privacy policy aims to give you information on how we process personal data which we collect about you in connection with the provision of our services, if you are a potential client or business contact, if you are applying for employment or work experience with us, if you are a contractor or other service provider or if you are a website user. In addition, it outlines your rights under the GDPR.

For the purposes of the GDPR, FSREG is the “**controller**” of the personal data which it collects and processes.

We may from time to time update this privacy policy. Please refer back regularly to see any if any changes have been made.

This privacy policy is divided into a number of sections to make it easier for you focus on the sections that are most relevant to you. The relevant sections are:

1. Clients.
2. Non-Client Business Contacts.
3. Contractors & Service Providers.
4. Job Applicants.
5. Visitors to Our Website.

If you have any queries in relation to our processing of your personal data please contact us using the contact details available on our website.

2. GLOSSARY

In this privacy policy:

“ personal data ” or “ personal information ”	means information relating to an identified or identifiable natural person;
“ special categories of personal data ”	includes information about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions and/or trade union membership, as well as information about health and genetic and biometric data;
“ we ”, “ us ”, “ the firm ”	means FSREG; and
“ you ”	is defined in each section of this privacy policy.

3. CLIENTS

This section of our privacy policy sets out how we may process personal data about clients of the firm. In this section:

“client”	means a client of the firm (whether an individual or organisation); and
“you” and “your”	means a person whose personal data is held by us, where that data has been provided to us by a client or by its directors, partners, employees, agents or representatives on its behalf, or has been collected by us, in each case, in the context of the provision by us of services to that client.

The data we may hold

We may hold various kinds of personal data about you, which the client or you provide to us from time to time. This may include names, dates of birth, addresses, work email addresses, personal email addresses, telephone numbers, places of work, job titles, copies of passports, driving licences, utility bills, bank account details, employment history, qualifications, and information provided to us by email or post, during telephone calls, interviews and/or meetings with the client or you.

In addition, we may collect personal data about you from background check providers, which may include credit references or reports from the disclosure and barring service (namely reports on unspent criminal convictions), from third party publicly accessible sources including Companies House records and social media, and from your use of our website, which may include technical data (including internet protocol (IP) address), 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 our website, and usage data (including information about how you use our website).

We will not usually collect any special categories of personal data about you, except where: (i) this is relevant to any services that we are providing to the client or you; or (ii) you are invited to attend certain firm social events where this may be relevant (for example lunches or dinners); or (iii) this is used as part of our anti-money laundering checks.

What we use your personal data for

We will only use your personal data for the following purposes:

1. To administer and manage our relationship with the client and/or you.
2. To provide, or facilitate the provision of, our services to the client.
3. To instruct bank transfers and other payments required as part of any transactions in respect of which we have provided our services.
4. To comply with our legal or regulatory requirements, such as anti-money laundering laws or the requirements of any relevant regulator.
5. To send you updates, news items, articles or other material which we think may be of interest to you.
6. To send you invitations to events and seminars and the like which we think may be of interest to you.

7. To monitor emails sent to us (including attachments) for viruses or malicious software.
8. To protect and manage email traffic.
9. Generally to manage the activities of the firm, including monitoring and recording electronic communications (including telephone calls and emails).

Legal basis for processing your personal information

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:

1. It is necessary for the performance of a contract between the firm and the client for the provision of our services or in order to take steps at your request prior to entering into such a contract.
2. It is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

We may also rely upon the following legal bases for processing your personal information:

1. It is necessary for us to comply with a legal obligation applicable to us.
2. It is necessary to protect your vital interests or those of another individual.

Please note that even where such processing is being carried out on the basis that it is necessary to pursue our legitimate interests, we will always weigh our legitimate interests against your interests and your fundamental rights and freedoms and will not process on that basis if your interests outweigh ours.

Please contact us if you need us to confirm which of the legal bases set out above we relied upon in a specific type of processing for a particular category of personal data.

Where your consent is required

We do not normally rely on consent to the processing of your personal data. However, if we consider it necessary to obtain your consent in relation to a certain planned use of your personal data, we will contact you specifically to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like to process and the reason we need to process it, so that you can carefully consider whether you wish to consent. Where you do consent and we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us.

Marketing

We may send to our client and to you, if you are a director, partner, employee, agent or representative of our client, from time to time, by electronic means or post, marketing communications:

1. if you have specifically requested that information from us; or
2. which relate to matters connected to those on which we have previously provided our services to the client or you, provided you have not opted out of receiving that marketing (which you may do at any time by contacting us).

Please note that you can ask us to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or, if there is no such link, by simply contacting us.

If you fail to provide personal information requested

Where we need to collect personal data by law or under the terms of a contract we have with the client or 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 the client or you (for example, to provide you with our services). We will notify you if this is the case at that time.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data retention periods

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 providing our services to the client and satisfying our legal, accounting, reporting and/or compliance obligations. 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 that personal data, the purposes for which we process that personal data and whether we can achieve those purposes through other means as well as the applicable legal requirements. Details of retention periods for different aspects of the personal data that we hold about you are available on request.

Disclosures of your personal data

Except as may be required by law or regulatory requirements, we will not disclose personal information we hold about you to any third party other than to third parties who are providing services to us, which may include the following:

1. IT service providers.
2. Event management businesses.
3. PR and marketing service providers.
4. Background and/or credit reference services.
5. Printers.
6. Telephone service providers.
7. Document storage providers.
8. Backup and disaster recovery service providers.
9. UK law firms.
10. Overseas law firms.
11. Professional services providers, such as accountants and tax advisers.

Where such data is provided to third parties, except if the third party acts as "**controller**" (such as a law firm) and is therefore bound to comply with the GDPR anyway, we will enter into agreements with such third parties to ensure that they process that data in accordance with the requirements of the GDPR.

International transfers

Some of the external service providers used by the firm are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever your personal data is transferred by us out of the EEA, unless it is to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission, we ensure a similar degree of protection is afforded to it by one of the following:

1. We put in place specific contracts approved by the European Commission which give personal data the same protection it has in Europe. These are commonly known as the "European Commission model contracts for the transfer of personal data to third countries".
2. Where the provider is in the US, the provider is registered with the Privacy Shield which requires them to provide similar protection to personal data as is required in Europe.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

Data security

We have put in place what we consider to be appropriate security measures (including network and database security measures) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed to unauthorised persons but we cannot guarantee the security of any data we collect and store.

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 also 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.

Your legal rights

In certain circumstances, by law you have the right to the following:

1. You may request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. You may ask us to correct the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. You may require erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
4. You may be able to object to us processing your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. You may request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

6. You may request the transfer of your personal information to another party.

If you wish to exercise any of the rights set out above, please contact us.

Where you have given consent to the processing of your personal data, you may equally withdraw that consent at any time. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal or the lawfulness of continued processing not based on consent. To withdraw your consent from the firm, please contact us.

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.

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.

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.

Complaints to the ICO

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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4. NON-CLIENT BUSINESS CONTACTS

This section of our privacy policy sets out how we may process personal data in relation to business contacts who do not have a current retainer with the firm, which may include non-client individuals to whom completion funds are to be transferred as part of a transaction, persons that are known to a director, consultant or employee of the firm, persons that have provided a business card to, or have corresponded with, a director, consultant or employee of the firm and/or persons that have attended firm events.

In this section "**you**" and "**your**" means a person who is a non-client business contact of the firm and whose personal data has been provided to or collected by us, in the context of our work in the provision of our services.

The data we may hold

We may hold various kinds of personal data about you which you provide to us from time to time. This may include names, dates of birth, addresses, work email addresses, personal email addresses, telephone numbers, places of work, job titles, copies of passports, driving licences, utility bills, bank account details, employment history, qualifications, and information provided to us during telephone calls, by letter or email and/or in meetings with you.

In addition, we may collect personal data about you from background check providers which may include credit references or reports from the disclosure and barring service (namely unspent criminal convictions), from third party publicly accessible sources including Companies House records and social media, and from your use of our website, which may include technical data (including internet protocol (IP) address), 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 our website, and usage data (including information about how you use our website).

We will not usually collect any special categories of personal data about you, except where: (i) this is relevant to any services that we are providing; or (ii) you are invited to attend certain firm social events where this may be relevant (for example lunches or dinners); or (iii) this is used as part of our anti-money laundering checks.

What we use your personal data for

We will only use your personal data for the following purposes:

1. To administer and manage our relationship or potential relationship with you.
2. To instruct bank transfers and other payments required as part of the transactions in respect of which we have provided our services.
3. To comply with our legal or regulatory requirements, such as anti-money laundering laws or the requirements of any regulator.
4. To send you updates, news items, articles or other material which we think may be of interest to you.
5. To send to you invitations to events and seminars and the like which we think may be of interest to you.
6. To monitor emails sent to us (including attachments) for viruses or malicious software.
7. To protect and manage email traffic.
8. Generally to manage the activities of the firm, including monitoring and recording electronic communications (including telephone calls and emails).

Legal basis for processing your personal information

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:

1. It is necessary in order to take steps at your request prior to entering into a contract between the firm and you.
2. It is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

We may also rely upon the following legal bases for processing your personal information:

1. It is necessary for us to comply with a legal obligation applicable to us.
2. It is necessary to protect your vital interests or those of another individual.
3. Your consent.

Please note that even where such processing is being carried out on the basis that it is necessary to pursue our legitimate interests, we will always weigh our legitimate interests against your interests and your fundamental rights and freedoms and will not process on that basis if your interest outweigh ours.

Please contact us if you need us to confirm which of the legal bases set out above we relied upon in a specific type of processing for a particular category of personal data.

Where your consent is required

If we consider it necessary to obtain your consent in relation to the use your personal data, we will contact you specifically to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. Where you do consent and we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us.

Marketing

We may send to you from time to time, by electronic means or post, marketing communications if:

1. you have specifically requested that information from us; or
2. you have specifically consented to receiving marketing communications from us; and
3. you have not opted out of receiving marketing communications (which you may do at any time by contacting us).

Please note, you can ask us to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or, if there is no such link, by simply contacting us.

If you fail to provide personal information requested

Where we need to collect personal data by law or under the terms of a potential contract we propose entering into with you and you fail to provide that data when requested, we may not be able to enter into the contract with you (for example, to provide you with our services). We will notify you if this is the case at that time.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data retention periods

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 our legal, accounting, reporting and/or compliance obligations. 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 that personal data, the purposes for which we process that personal data and whether we can achieve those purposes through other means as well as the applicable legal requirements. Details of retention periods for different aspects of the personal data that we hold about you are available on request.

Disclosures of your personal data

Except as may be required by law or regulatory requirements, we will not disclose personal information we hold about you to any third party other than to third parties who are providing services to us, which may include the following:

1. IT service providers.
2. Event management businesses.
3. PR and marketing service providers.

4. Background and/or credit reference services.
5. Printers.
6. Telephone service providers.
7. Document storage providers.
8. Backup and disaster recovery service providers.
9. UK law firms.
10. Overseas law firms.
11. Professional services providers, such as accountants and tax advisers.

Where such data is provided to third parties, except if the third party acts as a “controller” (such as a law firm) and is therefore bound to comply with the GDPR anyway, we will enter into agreements with such third parties to ensure that they process that data in accordance with the requirements of the GDPR.

International transfers

Some of the external service providers used by the firm are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever your personal data is transferred by us out of the EEA, unless it is to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission, we ensure a similar degree of protection is afforded to it by one of the following:

1. We put in place specific contracts approved by the European Commission which give personal data the same protection it has in Europe. These are commonly known as the “European Commission model contracts for the transfer of personal data to third countries”.
2. Where the provider is in the US, the provider is registered with the Privacy Shield which requires them to provide similar protection to personal data as is required in Europe.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

Data security

We have put in place what we consider to be appropriate security measures (including network and database security measures) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed to unauthorised persons but we cannot guarantee the security of any data we collect and store.

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 also 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.

Your legal rights

In certain circumstances, by law, you have the right to the following:

1. You may request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. You may ask us to correct the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. You may require erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
4. You may be able to object to us processing your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. You may request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. You may request the transfer of your personal information to another party.

If you wish to exercise any of the rights set out above, please contact us.

Where you have given consent to the processing of your personal data, you may equally withdraw that consent at any time. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal or the lawfulness of continued processing not based on consent. To withdraw your consent from the firm, please contact us.

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.

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.

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.

Complaints to the ICO

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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

5. CONTRACTORS & SERVICE PROVIDERS

This section of our privacy policy sets out how we may process personal data about contractors or other organisations providing services to the firm. In this section:

"contractor" or "service provider"	means an individual or organisation providing services to the firm; and
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<p>“you” and “your”</p>	<p>means a person whose personal data is held by us, where that data has been provided to us by a contractor or service provider or by its directors, partners, employees, agents or representatives on its behalf, or has been collected by us, in each case, in the context of the provision of services to the firm by that contractor or service provider.</p>
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The data we may hold

We may hold various kinds of personal data about you which the contractor or service provider or you provide to us from time to time. This may include names, dates of birth, addresses, work email addresses, personal email addresses, telephone numbers, places of work, job titles, copies of passports, driving licences, utility bills, bank account details, employment history, qualifications, and information provided to us during telephone calls, by letter or email and/or in meetings with the controller or service provider or you.

In addition, we may collect personal data about you from background check providers, which may include credit references or reports from the disclosure and barring service (namely unspent criminal convictions), from third party publicly accessible sources including Companies House records and social media, and from your use of our website, which may include technical data (including internet protocol (IP) address), 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 our website, and usage data (including information about how you use our website).

We will not usually collect any special categories of personal data about you, except where this is relevant to any services that you are providing to the firm or this is necessary as part of our compliance checks.

What we use your personal data for

We will only use your personal data for the following purposes:

1. To administer and manage our relationship with the contractor or service provider and/or you.
2. To comply with our obligations under the terms of a contract between the contractor or service provider and the firm.
3. To assess your skills and qualifications, your suitability for the role and to decide whether to enter into a contract with you or to permit access to our offices.
4. To assess and to monitor the standard of services being provided or offered to us.
5. To allow us to process payments in relation to any goods and services provided to the firm.
6. To update and maintain our records including details of people that have accessed our offices.
7. To detect, prevent, investigate and/or prosecute fraud and crime such as monitoring office CCTV.
8. To monitor emails sent to us (including attachments) for viruses or malicious software.
9. To protect and manage email traffic.
10. Generally to manage the activities of the firm, including monitoring and recording electronic communications (including telephone calls and emails).

Legal basis for processing your personal information

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:

1. It is necessary for the performance of a contract between the firm and the contractor or service provider and us or in order to take steps at your request prior to entering into such a contract.
2. It is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

We may also rely upon the following legal bases for processing your personal information:

1. It is necessary for us to comply with a legal obligation applicable to us.
2. It is necessary to protect your vital interests or those of another individual.

Please note that even where such processing is being carried out on the basis that it is necessary to pursue our legitimate interests, we will always weigh our legitimate interests against your interests and your fundamental rights and freedoms and will not process on that basis if your interests outweigh ours.

Please contact us if you need us to confirm which of the legal bases set out above we relied upon in a specific type of processing for a particular category of personal data.

Where your consent is required

We do not normally rely on consent to the processing of your personal data. However if we consider it necessary to obtain your consent in relation to a certain planned use of your personal data, we will contact you specifically to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like to process and the reason we need to process it, so that you can carefully consider whether you wish to consent. Where you do consent and we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us.

If you fail to provide personal information requested

Where we need to collect personal data by law or under the terms of a contract we have with the contractor or service provider or 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 the contractor or service provider or you. We will notify you if this is the case at that time.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data retention period

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 our legal, accounting, reporting and/or compliance obligations. 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 as well as the applicable legal requirements. Details of retention periods for different aspects of the personal data that we hold about you are available on request.

Disclosures of your personal data

Except as may be required by law or to comply with regulatory requirements, we will not disclose personal information we hold about you to any third party other than to third parties who are providing services to us, which may include the following:

1. IT service providers.
2. Landlords.
3. Office utility managers.
4. Background and/or credit reference services.
5. Telephone service providers.
6. Document storage providers.
7. Backup and disaster recovery service providers.

Where such data is provided to third parties we will enter into agreements with such third parties to ensure that they process that data in accordance with the requirements of the GDPR.

International transfers

Some of the external service providers used by the firm are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever your personal data is transferred by us out of the EEA, unless it is to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission, we ensure a similar degree of protection is afforded to it by one of the following:

1. We put in place specific contracts approved by the European Commission which give personal data the same protection it has in Europe. These are commonly known as the “European Commission model contracts for the transfer of personal data to third countries”.
2. Where the provider is in the US, the provider is registered with the Privacy Shield which requires them to provide similar protection to personal data as is required in Europe.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

Data security

We have put in place what we consider to be appropriate security measures (including network and database security measures) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed to unauthorised persons but we cannot guarantee the security of any data we collect and store.

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 also 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.

Your legal rights

In certain circumstances, by law you have the right to the following:

1. You may request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. You may ask us to correct the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. You may require erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
4. You may be able to object to us processing your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. You may request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. You may request the transfer of your personal information to another party.

If you wish to exercise any of the rights set out above, please contact us.

Where you have given consent to the processing of your personal data, you may equally withdraw that consent at any time. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal or the lawfulness of continued processing not based on consent. To withdraw your consent from the firm, please email us.

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.

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.

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.

Complaints to the ICO

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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

6. JOB APPLICANTS

This section of our privacy policy sets out how we may process personal data about applicants for jobs, students applying for or attending work experience with the firm and/or in relation to other potential employees of the firm.

In this section “**you**” and “**your**” means a person who is an applicant for work, or work experience, with the firm.

The data we may hold

In connection with your application for work with us, we may hold various categories of personal data about you, which you provide to us from time to time. This may include your name, date of birth, addresses, work email addresses, personal email addresses, telephone numbers, places of work, job titles, copies of your passport, driving licence, utility bills, bank account details, employment history, qualifications and CV, and information provided to us during telephone calls, interviews and/or meetings with you.

In addition, we may collect personal data about you from recruitment agencies and/or background check providers, which may include reports from the disclosure and barring service (namely unspent criminal convictions), from third party publicly accessible sources including Companies House records and social media, and from your use of our website, which may include technical data (including internet protocol (IP) address), 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 our website, and usage data (including information about how you use our website).

We may also hold special categories of personal data about you if this is necessary for the firm to comply with its legal and regulatory obligations.

What we use your personal data for

We will only use your personal data for the following purposes:

1. To assess your skills and qualifications, to consider your suitability for the position and to decide whether to enter into a contract with you.
2. To carry out background and reference checks.
3. To communicate with you about the recruitment process.
4. To keep records related to our hiring processes.
5. To comply with our legal and regulatory requirements.
6. To consider whether we need to provide appropriate adjustments during our recruitment process.
7. To be able to undertake equal opportunity monitoring and reporting.
8. To monitor emails sent to us (including attachments) for viruses or malicious software
9. To protect and manage email traffic.
10. Generally to manage the activities of the firm, including by monitoring and recording electronic communications (including telephone calls and emails).

Once we receive your CV and covering letter or your application form, we may process that information to decide whether we have any suitable vacancies and if you meet the basic requirements to be shortlisted for that role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the work. If we decide to offer you the work, we will then take up references and we may carry out criminal record or other checks before confirming your appointment.

Legal basis for processing your personal information

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:

1. It is necessary in order to take steps at your request prior to entering into a contract between you and the firm.
2. It is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

We may also rely upon the following legal bases for processing your personal information:

1. It is necessary for us to comply with a legal obligation applicable to us.
2. It is necessary to protect your vital interests or those of another individual.

Please note that even where such processing is being carried out on the basis that it is necessary to pursue our legitimate interests, we will always weigh our legitimate interests against your interests and your fundamental rights and freedoms and will not process on that basis if your interests outweigh ours.

Please contact us if you need us to confirm which of the legal bases set out above we relied upon in a specific type of processing for a particular category of personal data.

Where your consent is required

We do not normally rely on consent to the processing of your personal data. However if we consider it necessary to obtain your consent in relation to a certain planned use of your personal data, we will contact you specifically to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like to process and the reason we need to process it, so that you can carefully consider whether you wish to consent. Where you do consent and we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us.

Marketing & potential employment information

We may send to you from time to time, by email or post, marketing communications or information about employment opportunities from us if:

1. you have specifically requested that information from us; or
2. you have specifically consented to receiving that type of information from us; and
3. you have not opted out of receiving that type of information (which you may do at any time by contacting us).

Please note, you can ask us to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or, if there is no such link, by simply contacting us.

If you fail to provide personal information requested

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

Automated decision making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data retention periods

If your application is successful, the information you provide during the application process will be retained by us as part of your employee file and held in accordance with our data retention policy and all applicable laws.

If your application is unsuccessful, to determine the appropriate retention period for personal data provided during the application process, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we process that personal data and whether we can achieve those purposes through other means as well as the applicable legal requirements. Details of retention periods for different aspects of the personal data that we hold about you are available on request.

Disclosures of your personal data

Except as may be required by law or to comply with regulatory requirements, we will not disclose personal information we hold about you to any third party other than to third parties who are providing services to us, which may include the following:

1. IT service providers.
2. Event management businesses.
3. PR and marketing service providers.
4. Recruitment consultants.
5. Background and/or credit reference services.
6. Printers.
7. Telephone service providers.
8. Document storage providers.
9. Backup and disaster recovery service providers.

Where such data is provided to third parties we will enter into agreements with such third parties to ensure that they process that data in accordance with the requirements of the GDPR.

International transfers

Some of the external service providers used by the firm are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever your personal data is transferred by us out of the EEA, unless it is to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission, we ensure a similar degree of protection is afforded to it by one of the following:

1. We put in place specific contracts approved by the European Commission which give personal data the same protection it has in Europe. These are commonly known as the "European Commission model contracts for the transfer of personal data to third countries".
2. Where the provider is in the US, the provider is registered with the Privacy Shield which requires them to provide similar protection to personal data as is required in Europe.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

Data security

We have put in place what we consider to be appropriate security measures (including network and database security measures) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed to unauthorised persons but we cannot guarantee the security of any data we collect and store.

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 also 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.

Your legal rights

In certain circumstances, by law you have the right to the following:

1. You may request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. You may ask us to correct the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. You may require erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
4. You may be able to object to us processing your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. You may request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

6. You may request the transfer of your personal information to another party.

If you wish to exercise any of the rights set out above, please contact us.

Where you have given consent to the processing of your personal data, you may equally withdraw that consent at any time. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal or the lawfulness of continued processing not based on consent. To withdraw your consent from the firm, please contact us.

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.

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.

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.

Complaints to the ICO

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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

7. VISITORS TO OUR WEBSITE

This section of our privacy policy sets out how we may process personal data about visitors to our website.

In this section "you" and "your" means a person who accesses the firm's website.

The data we may hold

We may hold various kinds of personal data about you which you provide to us though using our website from time to time, which may include technical data (including internet protocol (IP) address), 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 our website and usage data (including information about how you use our website).

We do not collect any special categories of personal data about you through our website. Nor do we collect any information about criminal convictions and offences.

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

1. Direct interactions with you, including by filling in forms. This includes personal data you provide when you request information to be sent to you.
2. Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

3. Technical data from Analytics providers such as Google based outside the EU, advertising networks and search information providers.

What we use your personal data for

We will only use your personal data for the following purposes:

1. To administer and manage our relationship with you.
2. To use data analytics to improve our website and the user experience.
3. To comply with legal or regulatory requirements.
4. Generally to manage the activities of the firm.

Legal basis for processing your personal information

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:

1. It is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.
2. It is necessary for us to comply with a legal obligation applicable to us.

Please note that even where such processing is being carried out on the basis that it is necessary to pursue our legitimate interests, we will always weigh our legitimate interests against your interests and your fundamental rights and freedoms and will not process on that basis if your interest outweigh ours.

Please contact us if you need us to confirm which of the legal bases set out above we relied upon in a specific type of processing for a particular category of personal data.

Where your consent is required

We do not normally rely on consent to the processing of your personal data. However if we consider it necessary to obtain your consent in relation to a certain planned use your personal data, we will contact you specifically to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like to process and the reason we need to process it, so that you can carefully consider whether you wish to consent. Where you do consent and we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us.

Where our website provides links to other websites, we are not responsible for the data protection/privacy/cookie usage policies of those other websites, and you should check these policies on such other websites if you have any concerns about them. If you use one of these links to leave our website, you should note that we do not have any control over that other website.

Automated decision making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data retention periods

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. 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 as well as the applicable legal requirements. Details of retention periods for different aspects of the personal data that we hold about you are available on request.

Disclosures of your personal data

We will not disclose personal information we hold about you to any third party other than to third parties who are providing services to us, which may include the following:

1. IT service providers.
2. Backup and disaster recovery service providers.

Where such data is provided to third parties we will enter into agreements with such third parties to ensure that they process that data in accordance with the requirements of the GDPR.

International transfers

Some of the external service providers used by the firm are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever your personal data is transferred by us out of the EEA, unless it is to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission, we ensure a similar degree of protection is afforded to it by one of the following:

1. We put in place specific contracts approved by the European Commission which give personal data the same protection it has in Europe. These are commonly known as the "European Commission model contracts for the transfer of personal data to third countries".
2. Where the provider is in the US, the provider is registered with the Privacy Shield which requires them to provide similar protection to personal data as is required in Europe.

Data security

We have put in place what we consider to be appropriate security measures (including network and database security measures) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed to unauthorised persons but we cannot guarantee the security of any data we collect and store.

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 also 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.

Your legal rights

In certain circumstances, by law you have the right to the following:

1. You may request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. You may ask us to correct the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

3. You may require erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
4. You may be able to object to us processing your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. You may request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. You may request the transfer of your personal information to another party.

If you wish to exercise any of the rights set out above, please contact us.

Where you have given consent to the processing of your personal data, you may equally withdraw that consent at any time. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal or the lawfulness of continued processing not based on consent. To withdraw your consent from the firm, please contact us.

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.

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.

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.

Complaints to the ICO

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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.