

Simpson Wood - Privacy Notice

This Privacy Notice provides details of the personal data we collect from you, what we do with it, how you might access it and who it might be shared with; in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 1998 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

About Us

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at the end of this document

What we do with your personal data

We process personal data only for the purpose for which they are collected. The purpose is dependent on whether you use only our website, or additionally, our services. If you use our services you are required to register and we collect your personal data. We use this personal data for the provision of the service or the performance of the contract. We may use your personal data for other similar purposes, including marketing and communications, but that will only occur in the case we have your consent or another legal justification for doing so.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

We process and retain personal data for the following purposes and periods, with the applicable legal basis. This legal basis varies dependent upon the work we carry out, please contact us to find out more about the legal basis we have for holding your data.

Processing purpose	Legal basis	Retention period
Administrative enquiries	we have a contract with the data subject	Until contract completed
Budget management	we have a contract with the data subject	Until tax or other retention period expires
Business operations and due diligence	we have a contract with the data subject	Until tax or other retention period expires
Communications, marketing and intelligence	we have the data subject's consent	Until consent withdrawn
Contact management	we have a contract with the data subject	Until tax or other retention period expires
Customer support	we have a contract with the data subject	Until tax or other retention period expires
Debt management	we have a contract with the data subject	Until tax or other retention period expires
Fraud detection and prevention	we have to comply with a legal obligation	Until tax or other retention period expires
Identity verification	we have to comply with a legal obligation	Until tax or other retention period expires
Industry specific regulation, standards and intelligence	we have to comply with a legal obligation	Until tax or other retention period expires
Legal and regulatory compliance	we have to comply with a legal obligation	Until tax or other retention period expires
Payment Card Processing	we have a contract with the data subject	None
Service delivery	we have a contract with the data subject	Until tax or other retention period expires
Video surveillance	it's in our legitimate interest (Information, system, network and cyber security)	1 month

In some circumstances, we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

Change of purpose

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis that allows us to do so before starting any new processing.

What personal data do we collect?

The personal data we collect depends on whether you just visit our website or use our services. If you visit our website, you do not need to provide us with any personal data. However, your browser transmits some data automatically, such as the date and time of retrieval of one of our web pages, your browser type and settings, your operating system, the last web page you visited, the data transmitted and the access status, and your IP address.

If you use our services, personal data is required to fulfil the requirements of a contractual or service relationship, which may exist between you and our organisation.

We may collect (depending on the contract):

- Banking Details
- Confidential Correspondence
- Emails
- Employees Information
- Family Information
- Date of Birth
- Sex
- Identification Numbers (Tax Reference / National Insurance / etc.)
- Address Information
- Name

- Online Identifiers
- Telephone contact details
- Visual Images
- Credit History
- Financial Details
- Photographs together with Identifiers

Who might we share your personal data with?

As part of our contract with you, it may be necessary for us to share information with third parties. The reason for sharing information can vary on a case-by-case basis and is detailed further below.

Why might you share my personal data with third parties?

To maintain and improve our services, your personal data may need to be shared with or disclosed to service providers, other Controllers or, in some cases, public authorities. We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so. We will ensure that we will disclose only the minimum amount of your information necessary for the required purpose.

Which third-party service providers process my personal data?

“Third parties” includes third-party service providers and other entities within our group. Third-party service providers carry out the following activities: IT services, professional advisory services, Pension services, marketing services and banking services. All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

Transferring personal data outside the European Economic Area (EEA)

We will not transfer the personal data we collect about you outside of the EEA.

How do we look after personal data

We limit the amount of personal data collected only to what is fit for the purpose, as described above. We restrict, secure and control all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic. We retain personal data only for as long as is described above, to respond to your requests or longer if required by law. If we retain your personal data for historical or statistical purposes, we ensure that the personal data cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal data.

Data security

We have put in place commercially reasonable and 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How can you access your personal data?

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- 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 exercised your right to object to processing (see below).

- 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please contact our data protection point of contact specified at the end of this document.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our data protection point of contact specified at the end of this document.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Our Contact Information

(Data Controller)

Simpson Wood

Bank Chambers Market Street HD1 2EW United Kingdom Telephone: +441484 534431

Company Email: enquiries@simpson-wood.co.uk

Our Data Protection Officer

Mick Norton mick.norton@simpson-wood.co.uk Telephone: 01484 534431

Our Supervisory Authority

You have the right to lodge a complaint with any Supervisory Authority. See our Supervisory Authority contact details below

ICO

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Water Lane

Wilmslow

Cheshire

Sk9 5AF

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