

COFFEY GRAHAM (UK) LIMITED – PRIVACY POLICY

Introduction

We respect your privacy and are committed to protecting your personal data. This privacy policy will tell you how we look after your personal data, about your privacy rights and about how the law protects you.

We collect your personal data in various ways, including:

- directly from you, for example when you become a client of the firm and we need proof of identity and address;
- when we receive an e-mail from you; and
- when you visit our website www.cglaw.uk (regardless of where you visit it from).

There is more information in [section 3](#).

Please use the [glossary in section 11](#) to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

This privacy policy aims to give you information on how Coffey Graham (UK) Limited ("we", "us" or "our") collects and processes your personal data.

Controller

Coffey Graham (UK) Limited is the controller and responsible for your personal data.

Data privacy manager

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (as set out in [section 10](#)), please contact the data privacy manager using the details set out below.

Data privacy manager: Rory Graham

Email address: rory.graham@cglaw.uk

Postal address: 54 Kingsway Place, Sans Walk, London EC1R 0LU

Telephone number: 020 7099 7320

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.

Changes to the privacy policy and your duty to inform us of changes

This version was last updated on 25 May 2018, to ensure compliance with the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

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

Our website may include links to third-party websites. Clicking on those links or enabling those connections may allow 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 policy 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:

- **Identity Data** includes first name, middle name, last name, any former names, title, date of birth, gender and other family and lifestyle details.
- **Contact Data** includes address, email address and telephone numbers (which could be your work and/or your personal details).
- **Financial Data** includes bank account details.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may, in certain limited circumstances, collect **Special Categories of Personal Data** about you (this may include 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). This would only be for a specific purpose, such as in relation to a discrimination claim against an employer, and with your knowledge and consent.

We do not collect any information about criminal convictions and offences.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by corresponding with us by post, phone, email, messaging service, via our website or otherwise. Obviously, this is most likely to occur if you are our client or work for a client, if you are party to a transaction involving one of our clients or advise that party, or if you work for one of our suppliers.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity, Contact and Financial Data from other law firms, accountants, management consultants and other intermediaries;
 - Identity and Contact Data from our suppliers (i.e. where you are an employee of that supplier); and
 - Identity and Contact Data from publicly available sources such as Companies House.

4. How and why 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 perform the contract we are about to enter into or have entered into with you (a contract to provide legal services);



- 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; or
- where we need to comply with a legal or regulatory obligation.

To find out more about the types of [lawful basis](#) that we will rely on to process your personal data, please refer to the glossary in [section 11](#).

Generally, we do not rely on consent as a legal basis for processing your personal data other than in the unlikely event that we collect and process Special Categories of personal data.

Purposes for which we will use your personal data

We have set out below 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 we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) 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 table below.

Purpose/Activity	Types of data	Lawful basis for processing, basis of legitimate interest
To sign you up as a new client of Coffey Graham	Identity Contact	Performance of a contract with you to provide legal services, if you are an individual client of the firm To comply with a legal obligation (including money laundering checks) For our legitimate interests (we are unable to provide legal services to our clients until we have gone through the relevant checks and other client care steps)
To provide you (with legal services or interact with you in the course of doing so	Identity Contact Financial Marketing and Communications	Performance of a contract with you, if you are an individual client of the firm, including keeping you informed of changes in the law that may affect you For our legitimate interests (i.e. in order to run our business and provide an effective service – in respect of a matter, we need to communicate with the individuals at our client who are instructing us and individuals at other law firms, their clients and other advisors)
To manage our relationship with you (e.g. if you are a client or supplier of Coffey Graham)	Identity Contact Financial Data Marketing and Communications	Performance of a contract with you, if you are an individual client of the firm For our legitimate interests (e.g. to effectively manage our client files, to invoice our clients, to collect fees and pay our suppliers) For our legitimate interests (to provide our clients and contacts with useful and relevant information about legal updates, events (eg seminars or briefings or networking events we hold or are involved with))
To deliver relevant marketing and	Identity Contact	For our legitimate interests (to provide our clients and contacts with useful and relevant information about legal updates, events (eg seminars or briefings or networking



other similar materials to you	Marketing and Communications	events we hold or are involved with), and to grow our business)
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5. Marketing

We want to provide you with choices regarding certain personal data uses, particularly around marketing. We rarely send out direct marketing to our contacts, save as set out in the [table](#) in section 4.

We may use your Identity and Contact Data to determine what we think may be of interest to you in terms of legal updates and invitations to events (as described in the table). You will receive these from us if:

- you are or have been a client of the firm, as part of our legal service to you; or
- you have opted-in to receive such communications

and, in both cases, you have not opted out of receiving that material.

Opting out

You can ask us to stop sending you such material at any time by [contacting us](#). Where you opt out of marketing material, this will not apply to personal data provided to us in the context of the provision of legal services to you.

Third parties and cookies

We do not share your personal data with third parties for marketing purposes.

Our website does not use cookies.

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 us](#).

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.

6. Disclosures of your personal data

We may have to share your personal data with [External Third Parties](#) (as set out in the glossary in [section 11](#)) for the purposes set out in the table in [section 4](#). We may also share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers 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.



7. International transfers outside the European Economic Area (EEA)

We may transfer your personal data (primarily your Identity and Contact Details) to a jurisdiction outside the EEA in the following circumstances:

- where the matter on which we are instructed by you or in relation to which you are a party or advisor involves jurisdictions outside the EEA and we need to communicate with relevant professionals or parties in those jurisdictions (in which case the transfer is necessary for the performance of a contract or our legitimate interests);
- where you ask us to – for example to introduce you to a contact in such a jurisdiction (in which case we have your explicit consent); or
- where an External Third Party processes your personal data in such jurisdictions (or in the Cloud in circumstances where the location of data centres cannot be controlled by us) as part of providing services to us (in which case it is necessary to enable us to provide our services to you).

8. 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.

9. Data retention

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, regulatory, 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.

We typically retain certain data about our clients (including Contact, Identity and Financial Data) for a period of 6 years after they have ceased to be a client, as we are required by our regulator to do.

In some circumstances you can ask us to delete your data: see [section 10](#) 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.

10. Your legal rights and our obligations

Under certain circumstances, you have rights under the GDPR and the DPA 2018 in relation to your personal data. To summarise, 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 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:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - 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
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- **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
- **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 or on another lawful basis.

If you wish to exercise any of the rights set out above, please [contact us](#).

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.

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.

11. Glossary

Lawful bases for processing your personal data

Legitimate Interest	the interest of our business in conducting and managing our business to enable us to provide the best service. 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 us ;
Performance of Contract	processing your data where it is necessary for the performance of a contract to which you are a party (for example the contract between us and you for the provision of legal services) or to take steps at your request before entering into such a contract;
Comply with a legal or regulatory obligation	processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to (e.g. regulations relating to money laundering);

Third parties we may pass your personal data to

External Third Parties	<ul style="list-style-type: none">• service providers acting as processors, including our providers of IT system management and information security;• professional advisers acting as processors or joint controllers including lawyers, bankers, accountants, auditors, insurers, management consultants and other intermediaries and business partners; and• HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers, such as the Solicitors Regulation Authority, the FCA, the PRA and the Bank of England.
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Coffey Graham (UK) Limited
25 May 2018