

Data Privacy Notice

Boyes Turner LLP and Boyes Turner Services Limited ("Boyes Turner", "we", "us" or "our") are committed to protecting your privacy.

This Notice sets out the basis on which any personal data (meaning any information about you which is personally identifiable) that Boyes Turner collects from you or that is provided to Boyes Turner, will be processed by Boyes Turner. Please read the following information carefully to understand Boyes Turner's practices regarding your personal data and your rights under data protection laws.

Amendments and updates to this Privacy Notice may be made from time-to-time. Any revisions will be posted on www.boyesturner.com, so you will always be aware of what information we collect and how we use that information. Please review www.boyesturner.com/privacy-policy regularly so that you are aware of any changes.

Who we are and contacting us

For the purpose of data protection laws, the data controller is Boyes Turner LLP, a Limited Liability Partnership registered in England and Wales under company registration number OC360595 and whose registered office address is at Abbots House, Abbey Street, Reading RG1 3BD. We are responsible for ensuring that the processing of personal data by us and our staff is in compliance with data protection laws. We have systems, processes and policies in place to ensure that our staff and third parties we engage to process personal data on our behalf, comply with data protection laws.

Contact Details

If you have any queries regarding this Notice and/or how we use your personal data, you can contact us:

By email: dpm@boyesturner.com

By post: Data Privacy Manager
Boyes Turner LLP
Abbots House
Abbey Street
Reading RG1 3BD

Complaints

If you have a complaint about the way we are using your personal data, please contact us as set out above so that we can deal with your concerns. You are also entitled to make a complaint to the Information Commissioner's Office (the supervisory authority for data protection in the UK).

Changes to your information

We want to ensure that we only hold personal data about you that is accurate and up to date. If your personal data changes (e.g. change of address or change of name) please let us know so that we can update our records accordingly.

Information we collect and what it is used for

Personal data, or personal information, means any information about a living individual from which that individual can be identified either directly or indirectly with other information in our possession.

As part of our business of providing legal and other professional services and/or responding to your requests and queries, we may collect the following information from you:

Contact details - email address, address, phone number.

Identification information – name, age, date of birth and marital status, copies of your passport, driving licence, birth certificate or other ID, National Insurance and tax details, details of your spouse/partner, dependents and family, nationality and immigration statuses.

Business details - your job title, department, and name of organisation and details relating to your professional experience and qualifications.

Financial information – billing and payment details, financial transaction details, credit information and history, bank and/or building society details, employment details including salary and benefits, pension arrangements, employment records.

Special categories of data - in certain cases we may, as part of the provision of legal and other professional services to you, need to obtain from you special categories of data (also known as sensitive personal data) including information about your racial or ethnic origin, political opinions, religious or similar beliefs, trade union memberships, physical or mental health including medical records, genetic and biometric data and criminal records.

Behavioural information – your behaviour and preferences, hobbies and interests.

Usage data – information about how you use our website and services.

How your personal data is collected

We collect most of this information from you, direct. However, we may also collect information:

- From publicly accessible sources, e.g. Companies House or HM Land Registry.
- Directly from a third party, e.g.:
 - Sanctions screening providers
 - Credit reference agencies
 - Client due diligence providers

- From a third party with your consent, e.g.:
 - Your bank or building society, another financial institution or advisor
 - Consultants and other professionals we may engage in relation to your matter
 - Your employer and/or trade union, professional body or pension administrators
 - Your doctors, medical and occupational health professionals
- Via our websites - we use cookies on our websites (for more information on cookies, please see our cookies policy on our websites) and may obtain information from analytics providers such as Google and Ruler.
- Via our information technology (IT) systems, e.g.:
 - Case management, document management and time recording systems
 - Door entry systems and reception logs
 - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

We will combine the information received from other sources with information provided and collected from you in order to provide you with our services.

Use of your information

Data protection laws require us to have a lawful basis for any processing of personal data. There are six lawful bases but the bases that we will use most often are as follows:

- Consent
- Necessary for the performance of a contract we have entered into or are entering into with you
- Necessary to comply with a legal or regulatory obligation
- For our legitimate interests or those of a third party. Where we rely on this basis we shall ensure that your interests and fundamental rights do not override our legitimate interests.

We set out below the ways in which we may use your information.

- **Provision of Services and Enquiries** – In order to provide you with our legal and other professional services, to deal with any enquiries and/or to comply with professional, legal and regulatory obligations that apply to you and/or to our business, we will need to process your Contact Details, Business Details, Financial Information and Special Categories of Data together with information regarding your matter or enquiry including our communications with you.
- **Identity and credit reference checks and Compliance** – We are required to process Identification Information to comply with our statutory obligations and those of our professional body. In addition we may undertake credit reference checks with credit reference agencies for our legitimate interests for credit control purposes.

- **External audits and quality checks** – We will process your Contact Details, Business Details together with information regarding your matter for quality control and external audit and quality checks for accreditations such as Lexcel and Investors in People. We will do this for our legitimate interests or those of a third party i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards and in order to comply with our legal and regulatory obligations.
- **Marketing** – We will process certain information such as Contact Details, Business Details and Behavioural Information for marketing and business development purposes. Where we do so this will be on the basis of your consent or for our legitimate interests. In particular:
 - We will store your Contact Details, Business Details and Behavioural Information in our CRM system
 - We may also hold other information that you provide to us such as your dietary requirements or information relating to your health or religious beliefs
 - We will send you newsletters, updates and invites to marketing events where you have consented to us doing so. Please see the section below headed Marketing Communications for further information
 - We make submissions to legal directories and for awards as part of our marketing and business development and in doing so we may process and disclose your information
- **Improvements** – We are continually looking for ways in which to improve our legal and professional services and in doing so we may use your Contact Details, Business Details, Financial Information, Behavioural Information and Usage Data. Where we process your information for such purpose, it shall be for our legitimate interests.
- **Security and auditing** – We may process certain information for security purposes to protect our business, staff and clients which may include Contact Details, Identification Information, Business Details, Usage Data and Financial Information. In addition we may gather, process and provide information relating to audits, enquiries and investigations by regulatory bodies. Where we process your information for such purpose, it shall be for our legitimate interests or in order to comply with legal or regulatory obligations.
- **Training** - We may process certain information including Contact Details, Business Details, Financial Information, Special Categories of Data and other details relating to your matter for training purposes. Where we process your information for such purpose it shall be for our legitimate interests so we can deliver the best quality service.

We may use the information you provide to us or we collect in the provision of the services/materials you have requested and/or to respond to your queries. Where you don't provide us with certain information we may be unable to provide you with the services and/or information requested.

Disclosure of your information

There may be circumstances when we need to pass your information to third parties such as the following:

- We may pass your information to third parties such as barristers, experts, courts, financial or other judicial bodies when necessary as part of the legal or professional services that we are providing to you.

- There are circumstances where the law allows or requires Boyes Turner to disclose information (including special categories of data) that we may hold about individuals whether they consent or not. These are:
 - When required by law
 - Protecting vital interests of an individual
 - When the information has already been made public by the individual
 - Conducting legal proceedings
 - Obtaining legal advice or defending legal rights
 - Maintaining for equal opportunities
 - Providing a confidential service where the individual’s consent cannot be obtained or it is reasonable to proceed without consent.
 - To any actual or prospective seller or buyer of our business
 - In order to comply with any legal obligation, or in order to enforce our terms and conditions we may be required to disclose your information
- To collect payment of our invoices.
- If we or substantially all of our assets are acquired by a third party, information held by us about our customers will be one of the transferred assets.
- We may share your information with our group companies, which means subsidiaries and holding companies.
- For the purposes of the prevention or detection of offences, and/or the apprehension or prosecution of offenders, we may share any information that we collect with the Police, other public or private sector agencies, governmental or representative bodies in accordance with the relevant legislation. This will include public authorities, insurance companies, finance companies and/or other agencies.

Marketing communications

When you contact us we ask you whether you would like to receive our marketing communications detailing news and services from Boyes Turner via email and/or via post that we feel may be of interest to you. In order to consent to receive these communications, you will need to opt in. You can at any time opt out of receiving these communications by notifying us. We provide a method of opting out on all of our email communications.

Your rights

You have a number of rights in relation to your personal information as follows:

- **Right of Access** – You have a right to request information regarding the personal data that we hold about you and the source(s) of that information. You can request a copy of any personal data we hold about you. This service is usually free of charge, although we have the right to charge a ‘reasonable fee’ in some circumstances.
- **Right of Rectification** – You have a right to request that we rectify any inaccuracies in relation to the personal data we hold.

- **Right of Erasure and Restriction** - In some circumstances, you have the right to request the erasure of your personal data or to request us to restrict the processing of your personal data.
- **Right to Object** - In some circumstances, you have the right to object to our processing of your personal data. You have an absolute right to object to any direct marketing.
- **Right of Portability** - In some circumstances, you have the right to request that your personal data be transferred to you or a new provider if the data is processed automatically.
- **Right to Withdraw Consent** - You have the right to withdraw consent to us processing your personal data. This will not affect the processing already carried out with your consent.

Any enquiries regarding the above rights or if you want to exercise any of these rights, please contact us by email to dpm@boyesturner.com or by post to Data Privacy Manager, Boyes Turner LLP, Abbots House, Abbey Street, Reading, RG1 3BD.

In addition to the above, you also have a right to lodge a complaint with the supervisory authority. In the UK, this is the Information Commissioner's Office.

Where we store your personal data

Boyes Turner takes all reasonable steps to ensure that your information is treated securely and in accordance with this Privacy Notice.

All personal information you provide to Boyes Turner is stored on Boyes Turner's secure IT systems within the EU.

Once Boyes Turner has received your information, Boyes Turner will use strict procedures and security features to try to prevent any unauthorised access to your personal information.

Transfers outside of the European Economic Area

We may be required to transfer your information to other countries outside of the European Economic Area (EEA) as part of the provision of legal and professional services to you. This could be to other law firms or professional advisors that we are working with in relation to your matter or to third parties at your request. Our staff may also access your information when working outside of the EEA. If you require further information regarding processing of your information outside of the EEA, please let us know.

How long do we hold your information?

We will hold onto your information only for as long as is necessary for the purpose for which it was provided to us or collected e.g. for as long as is necessary to provide any services requested by you or to respond to your queries. Where processing is based on your consent, we shall only process it until such time as you withdraw your consent.

Please let us know if any of your contact details change so that we can ensure we only hold accurate and up to date information.