

PRIVACY NOTICE



Collecting information

Carter Perry Bailey LLP is committed to protecting your privacy and maintaining the security of any personal information we receive from you. The purpose of this statement is to explain what personal information we collect and how we may use it.

Apart from the information that you voluntarily provide to us through email or in the process of retaining our services, we collect no personal data about you, and we do not collect more personal data than is necessary for a particular purpose.

We do not collect any data from you visiting our website.

Legal basis for using your data

We are required to have a lawful basis for processing your data.

We process your data:

- to provide legal services, including marketing and social activities and events.
- to comply with our legal obligations, including the regulatory requirements of our regulator.
- for our legitimate interests, as a business.
- when you consent.

Depending upon the circumstances of the legal services being provided, and sometimes in our capacity as an employer we may need to process special category data which are subject to additional requirements. The special categories of data which we may process relate to:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person
- an individual's health
- a natural person's sex life or sexual orientation
- criminal convictions or offences.

Information shared with third parties

We do not transfer your personal data or share it with anyone else unless:

- **It is necessary for the legal services that we provide** – In such circumstances, insofar as possible, we shall let you know in advance where your data is being transferred and why the transfer is necessary. Please also see the information relating to ‘international transfers’ below.
- **We are compelled to do so by law or a court order.**

Right to access

We will use our best endeavours to ensure that the personal data which we hold is as accurate as possible. Please let us know immediately if there any changes to your information or if you become aware that the information that we hold is incorrect.

You may contact us to find out what, if any, personal data we hold about you at the time, and ask us to correct or update this data. This is known as a Subject Access Request. Depending upon the circumstances, we may first need to validate your identity if such a request is made.

Right to object

You can tell us at any time if you would prefer not to receive our publications, event information and/or marketing communications. The easiest way to do this is to email tracy.bailey@cpblaw.com with the heading ‘unsubscribe’ or click on the ‘unsubscribe’ button which can be found at the bottom of our email communications with you.

Security

We are committed to keeping your personal data and records confidential. Our network is contained within a hosted system which is protected by Next Generation firewalls with regular monitoring to detect malicious activity. Access controls are in place and all external activity is encrypted.

Your personal data will only be handled by employees and consultants of this firm, who have all signed a confidentiality agreement, have the integrity to keep your personal data confidential and will use your data only for the purpose for which it was collected. Each staff member has their own password to log in to their own email account.

Retention

We only keep your personal data for as long as is necessary. Your files will be stored in archive for a period of 7 years and destroyed in accordance with our policy on the storage of files and retention of documents.

International Transfers of Personal Data

We provide legal services in relation to persons who are resident in the UK as well as those resident elsewhere, including the EEA.

Before 11pm on 31 December 2020, your personal data will have been processed in accordance with the General Data Protection Regulation (EU) 2016/679 and where applicable data protection legislation in the UK such as the Data Protection Act 2018.

After that time, that GDPR will be retained in UK domestic law and shall be known as the 'UK GDPR' which, together with the Data Protection Act 2018 and related legislation, as amended or replaced, we refer to here as the 'UK Data Protection Legislation'.

As at the end of the transition period at 11pm on 31 December 2020, the personal data of EEA residents will continue to be processed in accordance with the General Data Protection Regulation (EU) 2016/679 (the 'EU GDPR') as amended or replaced.

International Transfers from the UK:

Your data may be transferred outside the UK e.g. some of our secretarial and administrative activities are regularly carried out in France. The UK government has determined that all 27 EU and EEA members states as at 31 December 2020 have adequate data protection laws.

As at 31 December 2020, the UK government has also determined that it recognises all European Commission adequacy decisions that existed on that day.

Transfer of EEA individuals' data from the EEA to outside the EEA:

As regards the personal data of EEA residents, when we need to transfer your personal data information to countries outside the EEA (e.g. immediately after the 31 December 2020 - the UK) which do not have adequacy decisions from the European Commission we shall put appropriate safeguards in place to ensure that your information is adequately protected, such as:

- your explicit consent
- standard data protection clauses in contracts
- binding corporate rules or
- approved codes or conduct/certification.

When we transfer the personal data of EEA residents outside the EEA, we will take all reasonably necessary steps to ensure your data is protected to an equivalent standard as within the EEA.

Before 31 December 2020 the UK applied for an adequacy decision from the European Commission and the European Commission's data protection adequacy decisions are available on https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en.

European Representative

As the firm processes the data of some EEA residents, we have appointed a European Representative in relation to their data protection matters. The contact details for the firm's European Representative as of 31 December 2020 are:

Rickert Rechtsanwaltsgesellschaft m.b.H.
Colmanstrabe 15,
53115 Bonn,
Germany
(reference 'Data Protection Officer')

Email: art-27-rep-cpblaw@rickert.law
Telephone: +49 (0) 228 748 9800.

If you write to or email the European Representative please could you send a copy to us at Carter Perry Bailey, 10 Lloyd's Avenue, London, EC3N 3AJ (with reference 'Data Protection Officer') or to stephen.carter@cpblaw.com.

If you, for example, withdraw your consent, but have not yet informed the firm's European Representative, we shall keep our European Representative updated so that they can carry out their role.

Complaints

If you have any concerns about the way we handle your personal data, please contact us on the details below. You also have the right to make a complaint to the Information Commissioner's Office whose contact details are:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: casework@ico.org.uk

Telephone: +44 (0) 303 123 1113

Website: www.ico.org.uk

For EEA residents, you can contact the firm's European Representative, whose contact details are above.

Contacts and further information

If you have any questions about this privacy policy, or would like to obtain further information about your rights or the information we hold about you (or exercise those rights), please contact us by email on stephen.carter@cpblaw.com or by post to 10 Lloyd's Avenue, London EC3N 3AJ (with reference 'Data Protection Officer').

This privacy policy was last updated on 31 December 2020.