PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union and The UK Data Protection Act (UK DPA) and we are responsible as 'controller' of that personal data for the purposes of the GDPR and the (UK DPA). Our use of your personal data is subject to your instructions, the GDPR, (UK DPA), other relevant UK and EU legislation and our professional duty of confidentiality.

KEY TERMS

We, us, our	LexeFiscal LLP and our associated companies.
Personal data	Any information relating to an identified or identifiable individual.
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious or spiritual beliefs, philosophical beliefs or trade union membership. Genetic and biometric data. Data concerning health, sex life or sexual orientation.

PERSONAL DATA WE COLLECT ABOUT YOU

The table below sets out the personal data we will or may collect in the course of advising and/or acting for you.

Personal data we will collect	Personal data we may collect depending on why you have instructed us
Your name, address and telephone number Information to enable us to check and verify your identity, e.g. your date of birth or passport details Electronic contact details, e.g. your email address and mobile phone number	Your National Insurance and tax details. Your bank and/or building society details. Details of your professional online presence, e.g. LinkedIn profile. Details of your spouse/partner and dependents or other family members, e.g.

Information relating to the matter in which you are seeking our advice or representation Information to enable us to undertake a credit or other financial checks on you Your financial details so far as relevant to your instructions, e.g. the source of your funds if you are instructing on tax matter	if you instruct us on a trust matter or a will. Your employment status and details including salary and benefits, e.g. if you instruct us on matter related to your employment or in which your employment status or income is relevant. Details of your pension arrangements, e.g. if you instruct us on a tax, trust matter or in relation to financial arrangements. Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), e.g. if you instruct one of our consultants on a matter related to your employment or in which your employment records are relevant. Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs, e.g. if you instruct one of our consultants on discrimination claim. Your trade union membership, e.g. if you instruct one of our consultants on a discrimination claim or your matter is funded by a trade union. Personal identifying information, such as your hair or eye colour or your parents' names, e.g. if you instruct us to incorporate a company for you.

This personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

HOW YOUR PERSONAL DATA IS COLLECTED

We collect most of this information directly from you, however, we may also collect information:

• from publicly accessible sources, g. Companies House or HM Land Registry;
• directly from a third party, g.:
o sanctions screening providers;
o credit reference agencies;
o client due diligence providers;

• from a third party with your consent, e.g.:
o your bank or building society, another financial institution or advisor;
o consultants and other professionals we may engage in relation to your matter;
o your employer and/or trade union, professional body or pension administrators;
o your doctors, medical and occupational health professionals;
• via our website—we use cookies on our website.
• via our information technology (IT) systems, g.:
o case management, document management and time recording systems;
o 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. You can request a manual review of the accuracy of an automated decision if you are unhappy with it.

HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a proper reason for doing so. We use the information we collect about you to effectively run our business and to help us provide a safe and productive environment for you.

We also process Personal Data for the following purposes:

• to comply with any legal and regulatory obligations;
• for the performance of our contract with you or to take steps at your request before entering into a contract;
• to manage and plan our business;
• to send out business mailings;
• to provide information, including newsletters,
• for our legitimate interests or those of a third party; or
• where you have given

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide services to you.	For the performance of our contract with you or to take steps at your request before entering into a contract.
Conducting checks to identify our clients and verify their identity. Screening for financial and other sanctions or embargoes.	To comply with any legal and regulatory obligations.

Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by any professional regulator.	
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	To comply with any legal and regulatory obligations.
Ensuring business policies are adhered to, e.g. policies covering security and internet use.	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you.
Operational reasons, such as improving efficiency, training and quality control.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Ensuring the confidentiality of commercially sensitive information.	For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information. To comply with any legal and regulatory obligations.
Statistical analysis to help us manage our practice, e.g. in relation to our client base, work type or other efficiency measures.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Preventing unauthorised access and modifications to systems.	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you. To comply with our legal and regulatory obligations.
Updating client records.	For the performance of our contract with you or to take steps at your request

	before entering into a contract. To comply with any legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services.
Statutory returns.	To comply with any legal and regulatory obligations.
Ensuring safe working practices, staff administration and assessments.	To comply with any legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.
Marketing our services and those of selected third parties to: —existing and former clients; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former clients.
External audits and quality checks, e.g. for the audit of our accounts.	To comply with any legal and regulatory obligations.

The above table does not apply to special category personal data, which we will only process with your explicit consent.

PROMOTIONAL COMMUNICATIONS

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal data for promotional purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

• contacting us by emailing info@lexefiscal.com
• using the 'unsubscribe' link in

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

WHO WE SHARE YOUR PERSONAL DATA WITH

We routinely share personal data with:

• professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, or other experts;
• other third parties where necessary to carry out your instructions,g. HM Land Registry or Companies House;
• courts, tax tribunals and HMRC;
• credit reference agencies;
• our insurers and brokers;
• our IT providers;
• external auditors, e.g. the audit of our accounts; and
• our bank.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with any legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

WHERE YOUR PERSONAL DATA IS HELD

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: 'Transferring your personal data out of the EEA'.

HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

• to respond to any questions, complaints or claims made by you or on your behalf;
• to show that we treated you fairly;
• to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.

When it is no longer necessary to retain your personal data, we will delete it.

TRANSFERRING YOUR PERSONAL DATA OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA), e.g.:

• with your and our service providers located outside the EEA;
• if you are based outside the EEA;
• where there is an international dimension to the matter in which we are advising. These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries may not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal data will be secure. We will comply with the UK DPA and GDPR in respect of any such transfers.

If you would like further information please contact us (see 'How to contact us' below).

YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data.
Rectification	The right to require us to correct any mistakes in your personal data.
Erasure	The right to require us to delete your personal data—in certain situations.
Withdrawal of consent	The right to withdraw your consent on collection of personal data if it is the basis for the collection of personal data
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data.

Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/ or transmit that data to a third party—in certain situations.
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

You have the right to ask us not to process your personal information for marketing purposes. You can exercise your right to prevent such processing by contacting us at info@lexefiscal.com

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection

Regulation.

If you would like to exercise any of those rights, please:

• email, call or write to us. See below: '**How to contact us**'; and
• let us have enough information to identify you (e.g. your full name, address and client or matter reference number);
• let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
• let us know what right you want to exercise and the information to which your request relates.

KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost, used or accessed unlawfully. We limit access to your personal data to those who have a

genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns or telephone: 0303 123 1113.

CHANGES TO THIS PRIVACY POLICY

This privacy policy was published on 21st May 2018. We may change this privacy policy from time to time.

Please visit our website for important changes to the privacy policy, e.g. for purposes, in the identity of the controller, in the manner in which rights are exercised, in cross-border transfers. The posting of the updated privacy policy on our website is deemed to be notice given within a reasonable time before the changes take effect.

HOW TO CONTACT US

Please contact us and/or by post, email or telephone if you have any questions about this privacy policy or the information, we hold about you.

Our contact details are shown below:

Our contact details	Senior Partner's contact details
LEXeFISCAL LLP Our London Office: Suite 428B, 4th Floor 33 Cavendish Square W1G 0PW, London United Kingdom +44 (0)20 7129 1180	Dr Clifford J Frank +44 (0)20 7129 1180 info@lexefiscal.com