

WEDLAKE BELL LLP

WEBSITE PRIVACY NOTICE

Wedlake Bell

71 Queen Victoria Street

London

EC4V 4AY

Direct Dial 020 7395 3122

Direct Fax 020 7406 1601

Direct Email jcornthwaite@wedlakebell.com

PRIVACY NOTICE

This Privacy Notice takes effect on and from 25 May 2018, and is intended to tell you how we use your personal data. We have tried to explain what we do in enough detail to give you the information you need at a glance, with the option of following a link if you want to find out more; but if you still cannot find the information that you need, please email us at legal@wedlakebell.com

The Privacy Notice will apply whether you access our website at www.wedlakebell.com ("**Website**") using a computer, mobile phone, tablet, TV, or other device.

Please click on the links below for further information on our privacy practices:

- 1. Who we are**
- 2. Which categories of personal data we collect**
- 3. How your personal data are collected**
- 4. How we use your personal data**
- 5. To whom we may disclose your personal data**
- 6. What we do to keep your personal data secure**
- 7. Transferring and processing your personal data outside the European Economic Area**
- 8. Accessing your personal data and other rights you have**
- 9. Data Retention – How long will we store/keep your personal data**
- 10. Third-Party Links**
- 11. Cookies**
- 12. Your Choices (e.g. marketing related emails or otherwise)**
- 13. Changes to this Privacy Notice**
- 14. Contact Us / Further Information**

1. Who we are

Wedlake Bell LLP ("**Wedlake Bell**", "**we**", "**us**", "**our**" or "**ours**") is a limited liability partnership that provides English law professional services in the United Kingdom ("**UK**") to UK and overseas clients. We are authorised and regulated by the Solicitors Regulation Authority, and registered in England and Wales under registered number OC351980. The address of our registered office is 71 Queen Victoria Street, London, England EC4V 4AY, UK. We are responsible for the Website.

For the purposes of the General Data Protection Regulation, EU 2016/679 ("**GDPR**") and for UK data protection, we are the controller in respect of the processing described in this Privacy Notice. We are registered with the UK Information Commissioner's Office ("**ICO**") under registration number Z5854264.

2. Which categories of personal data we collect

We may collect, use, store and transfer different kinds of personal data about you, including the following:

- **Identity Data**, including names, title, nationality, date of birth, passport or national identity card details, tax status, countries of domicile and residence, and educational profile
- **Contact Data**, including your home and/or business addresses (postal and email) and telephone numbers
- **Financial Data**, including information as to your income, expenditure, assets, liabilities and bank account details
- **Technical Data**, including internet protocol (IP) addresses, the type of browser used while visiting the Website, and the numbers of users who visit the Website.
- **Usage Data**, including usage session dates and duration, page views, and how you use the Website and our services ("**Services**").
- **Marketing and Communications Data**, including your preferences in receiving marketing from us and your communication preferences.

The provision of our Services may also require us to process special category data (including personal data relating to racial or ethnic origin, political opinions, religious beliefs, trade union membership, health and sexual life) and/or data relating to criminal convictions and offences (together "**sensitive personal data**").

3. How your personal data are collected?

We may collect your personal data (or you may provide it to us) through various means, including from information that:-

- (a) is provided to us by you (for example, when you meet us, or when you communicate with us by telephone, post or email) or on your behalf or by your organisation;

- (b) is collected via the completion by you or us of client engagement formalities;
- (c) is drawn from publically-available sources or third parties;
- (d) is collected via closed circuit television monitoring in our offices;
- (e) is collected when you access our marketing materials; and/or
- (f) is otherwise collected in the normal course of our provision of the Services.

4. How we use your personal data

We may use the personal data that we collect for the following purposes:

- (a) to provide (or propose to provide) Services to you;
- (b) to manage and record our relationship with you, and to deal with any complaints that you have about it;
- (c) to monitor and improve the effectiveness of our Services;
- (d) to fulfill the purposes set out in section 12 below;
- (e) to comply with our legal and regulatory rights and obligations, and to seek advice thereon;
- (f) for safety and security purposes;
- (g) for any other purpose for which you provide us with your personal data.

Where one or more of the following lawful processing grounds applies we may process your personal data for any of the above purposes:-

- (a) the processing is necessary to perform a contract with you, or to comply with your request before entering that contract;
- (b) the processing is necessary for our legitimate interests or those of any client or third party;
- (c) the processing is necessary for us to comply with a legal obligation;
- (d) you have consented to the processing.

Other lawful processing grounds may apply where we process sensitive personal data.

We may combine the personal data that we collect from you to the extent permitted by applicable law. For example, we may combine various different databases that contain your personal data to allow us to provide better support services and more personalised content (such as marketing).

5. To whom we may disclose your personal data

We may disclose your personal data to:

- 5.1 your organisation;

- 5.2 our client(s) in the matter on which we are acting;
- 5.3 our subsidiaries;
- 5.4 third party providers of business, legal and professional services;
- 5.5 judicial and other authorities in connection with the enforcement or defence of legal rights and the provision of our services;
- 5.6 third parties in the event that all or substantially all of our business or assets are or are intended to be sold or otherwise assigned to another entity.
- 5.7 third parties with whom you request us to share your personal data.

6. What we do to keep your personal data secure

We have put in place appropriate physical and technical measures to safeguard the personal data that we collect in connection with our Services. 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. However, please note that although we take appropriate steps to protect your personal data, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure, and we cannot therefore guarantee the security of your personal data.

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.

7. Transferring and processing your personal data outside the European Economic Area

We will only transfer your personal data to countries outside the European Economic Area (which may not provide the same level of data protection as within it) in accordance with applicable laws or where you have given us your consent to do so.

8. Accessing your personal data and other rights you have

- 8.1 We will collect, store and process your personal data in accordance with your rights under any applicable data protection laws. Under certain circumstances, you will or may have the following rights in relation to your personal data:
 - I. **Subject Access** - the right to request details of the personal data which we hold about you and copies thereof.
 - II. **Right to Withdraw Consent** – (where you have consented to our processing of your personal data), the right to withdraw such consent at any time. If you wish to withdraw your consent to processing, please contact us using the details provided in section 14.
 - III. **Data Portability** – the right to request us to port (i.e. transmit) your personal data directly to another organisation.
 - IV. **Rectification** – the right to require us to rectify or update any incorrect or inaccurate personal data about you.

- V. **Erasure ('right to be forgotten')** - the right to have your personal data 'erased' in certain specified situations.
 - VI. **Restriction of processing** –the right in certain specified situations to require us to stop processing your personal data.
 - VII. **Object to processing** – the right to object to specific types of processing of your personal data, such as where we are processing your personal data for the purposes of direct marketing.
 - VIII. **Prevent automated decision-taking** – the right not to be subject to decisions being taken solely on the basis of automated processing.
- 8.2 If you wish to enforce any of your rights under applicable data protection laws, please see section 14 below. We will respond to your request without undue delay and by no later than one month from receipt of any such request, unless a longer period is permitted by applicable data protection laws, and, if permitted to do so by applicable data protection laws we may charge a reasonable fee for dealing with your request which we will notify to you.
- 8.3 If you are concerned that we have not complied with your legal rights under applicable data protection laws, you may contact the ICO (www.ico.gov.uk) which is the data protection regulator in the UK. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

9. Data Retention – How long we will store/keep your Personal data

We retain personal data for as long as necessary to fulfil the purposes for which they have been collected as outlined in this Privacy Notice unless a longer retention period is required by law. This will mean that, in many cases, we shall retain your personal data for the same period as we retain your files or a copy of them. When your personal data are no longer required for the said purposes or as required by applicable law, they will be deleted and/or returned to you in accordance with applicable law.

10. Third-Party Links

The Website may contain links to third party websites that are not operated by us or under our control and, as such, we are not responsible for their privacy practices or content. If you choose to use any third party website, any personal data collected by it will or may be subject to the Privacy Notice (if any) of that third party. We recommend that you take the time to review the privacy policies of any third parties to which you provide personal data.

11. Cookies

We may use cookies (small text files that can be read by a web server in the domain that put the cookie on your hard drive) on the Website. Cookies are assigned to and stored in a user's internet browser on a temporary basis (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage and content viewed which allows us to provide users with an enhanced and customized experience when engaging with our Website.

12. Your Choices (e.g. marketing-related emails or otherwise)

We may use your personal data (such as your contact details (e.g. name, address, email address, telephone number)) to send you marketing-related correspondence by email related to our Services. When we process your personal data for marketing purposes, we do so on the basis that we have obtained your consent to use your personal data for these purposes.

We may also use your personal data to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you.

To opt out of receiving marketing-related correspondence from us, please click "Unsubscribe" from any marketing or promotional email you receive from us, or contact us as explained in section 14 below.

13. Changes to this Privacy Notice

It is important that you check back often for updates to the Privacy Notice, as we may change it from time to time. The "Date last updated" legend at the bottom of this page states when the Notice was last updated, and any changes will become effective upon our posting of the revised Privacy Notice. Where appropriate we will provide you with a copy of it.

14. Contact Us / Further Information

If you have any questions regarding the collection, processing, or use of your personal data or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your personal data, please contact us:

- I. By post:**
Wedlake Bell LLP
71 Queen Victoria Street
London
EC4V 4AY
United Kingdom
- II. By email:**
legal@wedlakebell.com
- III. By telephone:**
+44 (0)207 395 3000

Date last updated : May 2018

© Wedlake Bell LLP 2018