

PRIVACY NOTICE FOR PERSONNEL

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

Payne Hicks Beach is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you before, during and after your working relationship with us, in accordance with the General Data Protection Regulation ("**GDPR**").

It applies to all job applicants, employees, partners, consultants and other workers.

Payne Hicks Beach is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. We are a firm of solicitors authorised by the Solicitors Regulation Authority ("**SRA**"). Our SRA number is 059098 and our registered office is at 10 New Square, Lincoln's Inn, London WC2A 3QG.

This notice applies to prospective, current and former personnel, whether temporary or permanent. It does not form part of any contract of employment or other contract to provide services. We may update this notice at any time. A copy also appears on our website (<http://www.phb.co.uk>) and should be drawn to the attention of any person for whom it may be relevant.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- (a) Used lawfully, fairly and in a transparent way.
- (b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- (c) Relevant to the purposes we have told you about and limited only to those purposes.
- (d) Accurate and kept up to date.
- (e) Kept only as long as necessary for the purposes we have told you about.
- (f) Kept securely.

3. THE KIND OF INFORMATION WE HOLD 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).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copies of identification documents such as passport and driving licence.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as entry card and key fob records.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.
- Information about criminal convictions and offences.

4. **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We typically collect personal information about personnel through the application and recruitment process, either directly from candidates, from an employment agency/background check provider, or both. We may sometimes collect additional

information from third parties including former employers, credit reference agencies or other background check agencies. Information regarding criminal convictions will usually be collected from the Disclosure and Barring Service. We will also collect information from publicly available sources such as professional regulators and social media platforms. We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

5. HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- (a) Where we need to perform a contract we have entered into with you.
- (b) Where we need to comply with a legal obligation.
- (c) 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.

We may also use your personal information in the following situations, which are likely to be rare:

- (a) Where we need to protect your interests (or someone else's interests).
- (b) Where it is needed in the public interest.

Situations in which we will use your personal information

We need all the categories of information in section 3 above, primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Some of the main situations in which we will process your personal information are listed below. We have set out the likely purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are typically involved.

Situation	Data category	Lawful basis for processing
Making a decision about your recruitment or appointment (to include assessing your skills, qualifications and suitability and communicating with you accordingly)	<p>Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses</p> <p>Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview)</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p>	To pursue our legitimate interest in selecting suitable personnel

	<p>Compensation history</p> <p>Performance information</p> <p>Disciplinary and grievance information</p>	
	Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions	Your explicit consent
	Trade union membership	Your explicit consent
	Information about your health, including any medical condition, health and sickness records	Your explicit consent
	Information about criminal convictions and offences	Your explicit consent
Determining the terms on which you work for us	<p>Salary, annual leave, pension and benefits information</p> <p>Start date</p> <p>Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview)</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Compensation history</p> <p>Performance information</p> <p>Disciplinary and grievance information</p>	To pursue our legitimate interest in administering a working relationship with you
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
Checking you are legally entitled to work in the UK	<p>Copies of identification documents such as passport and driving licence</p> <p>Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of</p>	To enable us to comply with legal obligations

	the application process such as at interview)	
Paying you and, if you are an employee, deducting tax and National Insurance contributions	<p>Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses</p> <p>Date of birth</p> <p>Marital status and dependants</p> <p>National Insurance number</p> <p>Bank account details, payroll records and tax status information</p> <p>Salary, annual leave, pension and benefits information</p> <p>Start date</p>	To allow us to perform our contract with you and to enable us to comply with legal obligations
Providing the following benefits to you: private medical cover, life insurance, permanent health insurance	<p>Date of birth</p> <p>Gender</p> <p>Marital status and dependants</p> <p>National Insurance number</p> <p>Bank account details, payroll records and tax status information</p> <p>Salary, annual leave, pension and benefits information</p> <p>Start date</p> <p>Location of employment or workplace</p>	To allow us to perform our contract with you
	Information about your health, including any medical condition, health and sickness records	To enable us to comply with legal obligations and exercise specific rights
	Genetic information and biometric data	To enable us to comply with legal obligations and exercise specific rights
Liaising with your pension provider	<p>Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses</p> <p>Date of birth</p> <p>Gender</p> <p>Marital status and dependants</p>	To allow us to perform our contract with you

	<p>Next of kin and emergency contact information</p> <p>National Insurance number</p> <p>Bank account details, payroll records and tax status information</p> <p>Salary, annual leave, pension and benefits information</p> <p>Start date</p>	
<p>Administering a contract we have entered into with you</p>	<p>Bank account details, payroll records and tax status information</p> <p>Salary, annual leave, pension and benefits information</p> <p>Start date</p> <p>Location of employment or workplace</p> <p>Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview)</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p>	<p>To allow us to perform our contract with you</p>
<p>Business management and planning, including accounting, auditing and insurance</p>	<p>Next of kin and emergency contact information</p> <p>Salary, annual leave, pension and benefits information</p> <p>Location of employment or workplace</p> <p>Photographs and CCTV footage</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Electronic entry card/key fob data</p>	<p>To pursue our legitimate interest in operating our business effectively</p>

	Personal information such as photographs, qualifications and experience (for publication in marketing material and on our website and intranet)	
Conducting performance reviews, managing performance and determining performance requirements	Salary, annual leave, pension and benefits information Start date Location of employment or workplace Employment records (including job titles, work history, working hours, training records and professional memberships) Compensation history Performance information Disciplinary and grievance information	To enable us to comply with legal obligations
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
Making decisions about salary reviews and compensation	Salary, annual leave, pension and benefits information Start date Employment records (including job titles, work history, working hours, training records and professional memberships) Compensation history Performance information Disciplinary and grievance information	To allow us to perform our contract with you, to enable us to comply with legal obligations and to pursue our legitimate interest in growing and managing our business
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
Assessing qualifications for a particular job or task, including decisions about promotions	Start date Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such	To allow us to perform our contract with you and to pursue our legitimate interest in growing and managing our business

	<p>as at interview)</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Compensation history</p> <p>Performance information</p> <p>Disciplinary and grievance information</p>	
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
Gathering evidence for possible grievance or disciplinary hearings	<p>Location of employment or workplace</p> <p>Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview)</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Compensation history</p> <p>Performance information</p> <p>Disciplinary and grievance information</p>	To allow us to perform our contract with you, to enable us to comply with legal obligations and to pursue our legitimate interest in managing our business
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
Making decisions about your continued employment or engagement	<p>Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview)</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Compensation history</p>	To allow us to perform our contract with you and to pursue our legitimate interest in managing our business

	<p>Performance information</p> <p>Disciplinary and grievance information</p> <p>Information about your use of our information and communications systems</p>	
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
Making arrangements for the termination of our working relationship	<p>Bank account details, payroll records and tax status information</p> <p>Location of employment or workplace</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p>	To allow us to perform our contract with you and to pursue our legitimate interest in managing our business
Education, training and development requirements	<p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Performance information</p>	To allow us to perform our contract with you and to enable us to comply with legal obligations
Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work	<p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Disciplinary and grievance information</p> <p>Information about your use of our information and communications systems</p>	To allow us to perform our contract with you and to enable us to comply with legal obligations
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
Ascertaining your fitness to work	Information about your health, including any medical condition, health and sickness records	To allow us to perform our contract with you and to enable us to comply with legal obligations
Managing sickness absence	Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses	To allow us to perform our contract with you and to enable us to comply with legal obligations
	Employment records (including job titles, work history, working hours, training records and	

	professional memberships)	
	Information about your health, including any medical condition, health and sickness records	To enable us to comply with legal obligations and exercise specific rights
Complying with health and safety obligations (including assessing any need for appropriate adjustments)	Next of kin and emergency contact information Location of employment or workplace	To allow us to perform our contract with you and to enable us to comply with legal obligations
	Information about your health, including any medical condition, health and sickness records	To enable us to comply with legal obligations and exercise specific rights
To prevent fraud	Copies of identification documents such as passport and driving licence Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview) Employment records (including job titles, work history, working hours, training records and professional memberships) Disciplinary and grievance information	To enable us to comply with legal obligations and to pursue our legitimate interest in preventing criminal activity
	Information about criminal convictions and offences	To enable us to comply with legal obligations and exercise specific rights
To monitor your use of our information and communication systems (to include reading your emails and calendar and checking computer log-in details) to ensure compliance with our IT policies and legal and regulatory obligations	Information about your use of our information and communications systems	To enable us to comply with legal obligations and to pursue our legitimate interest in managing our business
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious	Information about your use of our information and communications systems	To enable us to comply with legal obligations and to pursue our legitimate interest in protecting systems and data

software distribution		
To conduct data analytics studies to review and better understand employee retention and attrition rates	<p>Date of birth</p> <p>Gender</p> <p>Marital status and dependants</p> <p>Salary, annual leave, pension and benefits information</p> <p>Start date</p> <p>Location of employment or workplace</p> <p>Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process such as at interview)</p> <p>Employment records (including job titles, work history, working hours, training records and professional memberships)</p> <p>Compensation history</p> <p>Performance information</p> <p>Disciplinary and grievance information</p>	To pursue our legitimate interest in growing and managing our business
Equal opportunities monitoring	<p>Date of birth</p> <p>Gender</p> <p>Marital status and dependants</p> <p>Educational and personal circumstances (such as caring responsibilities and whether state or private school attended)</p>	Your explicit consent
	Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions	Your explicit consent
	Trade union membership	Your explicit consent
	Information about your health, including any medical condition, health and sickness records	Your explicit consent

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- (a) In limited circumstances, with your explicit written consent.
- (b) Where we need to carry out our legal obligations and in line with our data protection policy.
- (c) Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy.
- (d) Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family-related leave, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We may use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

7. INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- To inform our decision making about recruitment, promotion and continued employment.
- To notify regulators such as the Solicitors Regulation Authority.
- To notify other interested parties such as our professional indemnity insurers.

We are allowed to use your personal information in this way in order to carry out our professional and regulatory obligations.

8. AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- (a) Where we have notified you of the decision and given you 21 days to request a reconsideration.
- (b) Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- (c) In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

9. **DATA SHARING**

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. Information regarding candidates applying for employment with us is shared with fewer third parties than information regarding those we have recruited.

Which third party service providers process my personal information?

"Third parties" includes third party service providers (including contractors and designated agents). By way of example, the following activities are partly or entirely carried out by third-party service providers: recruitment, payroll, pension administration, benefits provision and administration, IT services, professional indemnity insurance, training and education. Our professional indemnity brokers are Lockton Companies LLP ("**Lockton**"). Lockton's data protection information notice may be found here: [Lockton's Data Protection Information Notice](#).

How secure is my information with third party service providers?

All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business, or if it is required for legitimate business activities (or similar) by our related organisations, Payne Hicks Beach Trustees (company number 02545358), Payne Hicks Beach Trust Corporation Limited (company number 00850087) and Payne Hicks Beach LLP (company number OC353045). The registered office for these entities is 10 New Square, Lincoln's Inn, London WC2A 3QG.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We do not anticipate that it will be necessary to transfer the personal information we collect about you to countries outside the EU in order to perform our contract with you. Should it become necessary to do so, we may need to ensure that there is an adequacy decision by the European Commission in respect of the relevant country or countries. This would mean that the country or countries were deemed to provide an adequate level of protection for your personal information.

If no adequacy decision has been made, in order that your personal information receives an adequate level of protection we may need to put in place appropriate measures to

ensure that it is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

10. DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

11. DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available on our intranet. 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 retain personal data belonging to unsuccessful applicants partly so we can show that we have conducted the recruitment exercise fairly and have not discriminated on prohibited grounds. For such applicants, who will not have access to our intranet, the relevant retention periods are generally as follows:

Recruitment data (including CV, covering letter, application forms, assessments, interview notes)	1 year after the final decision is communicated
CCTV footage and images	2 years after the footage or images were first captured

Please note that all retention periods are presented by way of general guidance only and different time frames may apply.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

12. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer (whose details are provided below) in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Data Protection Officer (whose details are provided below). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

14. DATA PROTECTION OFFICER

We have appointed a data protection officer ("**DPO**") to oversee compliance with this privacy notice. Our DPO is Jonathan Sewell (telephone 020 7465 4388 or e-mail jsewell@phb.co.uk). If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. 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.

15. **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.