

PAYNE HICKS BEACH

WEBSITE PRIVACY POLICY

1. **Introduction**

We take data protection seriously and safeguarding the privacy of visitors to our website (<http://www.phb.co.uk/>) is important to us. We only collect relevant data in accordance with the UK General Data Protection Regulation ("**UK GDPR**") and the Data Protection Act 2018 ("**DPA 2018**").

2. **Purpose**

This privacy policy explains how we use any personal information we may collect when you visit the website and outlines the obligations and requirements of the users, the website and the website owners. It also explains our use of cookies in accordance with our Cookies Policy and tells you how to contact us if you have any queries about how we use your personal information.

The website is owned by Payne Hicks Beach LLP, trading as Payne Hicks Beach, 10 New Square, Lincoln's Inn, London WC2A 3QG (referred to in this policy as the "**Firm**").

3. **Scope**

This privacy policy only relates to the website. Any links from the website to other websites are provided merely for your convenience and do not imply endorsement by us of the content or provider.

4. **Responsibility**

The Firm's Data Protection Officer ("**DPO**"), is responsible for monitoring the Firm's compliance with this policy. The DPO may be contacted in the following ways: by telephoning 020 7465 4300, email: data@phb.co.uk or writing to the Firm's address set out above.

5. **Your privacy rights**

Your rights are as follows:

- right of information and access to confirm details about the personal data that is being processed about you and to obtain a copy;
- right to rectification of any inaccurate personal data;
- right to erasure of personal data held about you (in certain circumstances);
- right to restriction on the use of personal data held about you (in certain circumstances);
- right to portability – right to receive data processed by automated means and have it transferred to another data controller; and
- right to object to the processing of your personal data.

Due to these rights, if you have provided us with consent you are free to withdraw the consent you have previously provided at any time. However, there will be some cases where these rights are overridden by our legal obligation to hold, process or transfer certain data.

6. **Information collected and how it is used**

When you access or sign up to some of the Firm's services, such as the provision of newsletters and bulletins, you will be asked to consent to us collecting, storing and processing your data

where required. By agreeing, you are consenting to the fact that we may collect and process personal information such as your:

- name;
- postal address;
- telephone number;
- email address;
- date of birth;
- relationship status; and
- account details.

Depending on the matter we may need to hold sensitive data also known as special categories of personal data such as:

- medical conditions and/or records (depending on the matter);
- details relating to your family;
- sexual orientation;
- religious or political beliefs; and
- other sensitive information that will be needed to conduct our contractual obligations to yourself.

If this personal data or sensitive personal data is not obtained, this will limit our ability to help you and may even result us terminating our agreement with yourself.

If we rely on consent to process your data, we will retain your personal data for no longer than is necessary for the service that we provide for you.

We will store and use personal information (that you provide) for purposes such as:

- administering and maintaining our relationship with you;
- providing services or information requested by you; and
- providing you with further information about our products and services; and
- auditing usage of the website.

The information we have has been provided to us by you. However, if a relationship is established we may need to conduct searches or use third parties (which will be explained in our terms of business) to obtain further information or complete checks on yourself which are required by law.

Your information will not be disclosed to third parties except where that is necessary for fulfilment of our obligations to you and we have consent from yourself that we can do this, or we are obliged or permitted to do so by law.

We do not perform any automated decision-making or profiling with your data.

The Firm does collect personal data through cookies (see below) and aggregated data which is used to help the Firm improve the quality of the website. We use HubSpot to collect, manage and store personal data, that is submitted via the new enquiry forms available on the website.

HubSpot's privacy policy can be found at: <https://legal.hubspot.com/product-privacy-policy> and HubSpot's data processing agreement can be found at <https://legal.hubspot.com/dpa>.

7. **Children's personal data**

The Firm is aware that children may access the internet whether purposely or accidentally. Once identified that the person is a child we will delete any personal data held or request permission from the parents or legal guardian of the child before any further action is taken. If no consent is received, the data will be deleted.

8. **Use of your information outside the UK**

In order to provide you with requested products and services we may need to transfer your personal information to service partners based in countries outside the UK. We will generally only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data in accordance with the UK GDPR.

Where we use certain service partners, we may use specific contracts approved such as standard contractual clauses for use in the UK in accordance with the UK GDPR which give personal data the same protection it has in the UK.

9. **Security**

The Firm has policies and technical measures in place to safeguard and protect your personal information against unauthorised access, accidental loss, improper use and disclosure. This is done through the firewalls, password protection, anti-virus and malware software and internal training for our staff. For advice on how to protect information being transferred via the internet please visit: <https://ico.org.uk/for-the-public/online/social-networking/>.

10. **Retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements and in accordance with our data retention policy.

11. **How we use cookies**

Our online services use cookies, small text files originating from us and stored by your computer. The cookie file helps identify you and any particular interests or preferences you express, making your future website visits more efficient, but it does not store any other personal information. Cookies allow the website, through its server, to provide users with a tailored experience.

This website will request consent for us to use cookies where we are required to do so. If you decide not to provide consent, then cookies may not be used.

The website uses tracking software to monitor its visitors in order to understand better how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to the user's computer's hard drive in order to track and monitor

their engagement and usage of the website, but will not store, save or collect personal information. For further information, users can read Google's privacy policy here <http://www.google.com/privacy.html>.

Other cookies may be stored on the user's computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically they can expire after 30 days, though some may take longer and such expiry dates can be found on our Cookies Policy.

Click here Cookies Policy to see our separate dedicated Cookies Policy web page for further information.

12. **Contact and communication**

Users contacting this website and/or its owners do so of their own volition and provide any personal details requested at their own risk. Users' personal information is kept private and stored securely until such time as it is no longer required or has no use.

Every effort has been made to ensure a safe and secure email submission process but users are advised that they use the email submission system at their own risk.

This website and its owners may use any information submitted to provide users with further information about services they offer and the job opportunities available or to assist users in answering any questions or queries they may have submitted. This includes using their details to subscribe them to any email newsletter program operated by the website but only if this was made clear to users and their express permission was granted when submitting any form to the email process or where the user has previously purchased from or enquired about purchasing from the company a product or service to which the email newsletter relates. This is by no means an entire list of user rights in regard to receiving email marketing material. User details are not passed on to any third parties without their prior consent.

13. **Marketing**

This website operates an optional marketing facility so that we may provide information we think may be of interest, such as newsletters and bulletins, to those who request it.

Users can subscribe through an online automated process should they wish to do so but this is at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are taken in compliance with UK spam laws. All personal details relating to subscriptions are held securely and in accordance with the governing data protection legislation, the UK GDPR and DPA 2018.

Email marketing campaigns published by this website or its owners may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include; the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity. This is not a comprehensive list.

This information is used to refine future email campaigns and supply the user with more relevant content based around their activity.

Subscribers are given the opportunity to un-subscribe at any time. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable, clear instructions on how to un-subscribe will be detailed instead.

Alternatively, if you change your mind and would like to withdraw your consent, you may notify us at any time by sending an email: marketing@phb.co.uk or writing to Marketing, Payne Hicks Beach LLP, 10 New Square, Lincoln's Inn, London WC2A 3QG.

14. **External links**

Although this website tries to include only safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout this website.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or problems caused, or issues arising from, visiting any external links.

15. **Adverts and sponsored links**

This website may contain sponsored links and adverts. These will typically be served through the owner's advertising partners, who will have detailed privacy policies relating directly to the adverts they place.

Clicking on any such adverts will send the user to the advertiser's website through a referral program which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on the user's computer's hard drive. Users should therefore note that they click on sponsored external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

16. **Social media platform**

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate/engage upon them with due care and caution in regard to their own privacy and personal details. Neither this website nor its owners will ever ask for personal or sensitive information through social media platforms. We encourage users wishing to discuss sensitive details to contact us through primary communication channels such as by telephone.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save a request to share a web page respectively through your social media platform account.

17. **Shortened links in social media**

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default some social media platforms shorten lengthy urls web addresses (this is an example: <http://bit.ly/zyVUBo>).

Users are advised to exercise caution and good judgement before clicking any shortened urls published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine urls are published, many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

18. **EU representative**

We have appointed IT Governance Europe Limited to act as our EU representative. If you wish to exercise your rights under the EU GDPR, or have any queries in relation to your rights or general privacy matters, please email our representative at eurep@itgovernance.eu. Please ensure to include our firm name in any correspondence you send to our representative.

19. **Complaints**

If you have any complaints regarding the processing of your personal data, or wish to raise any other matter, please contact our Data Protection Officer without delay.

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