Hudson McKenzie 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.

Our use of your personal data is subject to your instructions, the EU General Data Protection Regulation (GDPR), other relevant UK and EU legislation and our professional duty of confidentiality.

Key terms

It would be helpful to start by explaining some key terms used in this document:

We, us, our	Hudson McKenzie, Berkeley Square House, Mayfair, London W1J 6BD.
Our data protection officer	Zahira Razaq **E: dataprotection@hudsonmckenzie.com** **T: 020 3318 5794**
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 beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

Hudson McKenzie is a trading name of Hudson McKenzie Ltd., a private limited company incorporated in England & Wales under company number 07147428 and whose registered office is located at Berkeley Square House, Mayfair, London, W1J 6BD, United Kingdom. A list of Directors of Hudson McKenzie Ltd. is available for inspection at its registered office. The term "Partner", if used, denotes a Director of Hudson McKenzie Solicitors or a senior solicitor/consultant of Hudson McKenzie Solicitors with equivalent standing and qualifications. Hudson McKenzie is a recognised body and is authorised and regulated by the Solicitors Regulation Authority (SRA No.596422). The firm is registered for VAT, registration no. 101337371.

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	Your National Insurance and tax
Personal data we will collect	Personal data we may collect depending on why you have instructed us
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 Information relating to the matter on which you are seeking our services Information to enable us to undertake a credit or other financial checks on you Your financial details so far as relevant to your instructions. Information about your use of our IT, communication and other systems, and other monitoring information.	details Your bank and/or building society details Details of your spouse/partner and dependants or other family members, e.g. if you are a PEP Your employment status and details including salary and benefits. Details of your accountants.

This personal data is required from you 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

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We collect most of this information from you direct. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
    - sanctions screening providers;
    - credit reference agencies; – client due diligence providers;
- from a third party with your consent, e.g.:
    - your bank or building society, another financial institution or advisor;
    - consultants and other professionals we may engage in relation to your matter;
    - your professional body payroll provider or pension administrators;
- via our information technology systems, e.g.: time recording systems;

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, e.g.:
- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- you have given consent.

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 legal 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 Other processing necessary to comply with professional, legal and regulatory obligations that apply	To comply with our legal and regulatory obligations

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to our business, e.g. under health and safety regulation or rules issued by our professional regulator	
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies	For our legitimate interests or those

covering security and internet use	of a third party
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party To comply with our legal and regulatory obligations
Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests or those of a third party
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party To comply with our legal and regulatory obligations
Updating and enhancing 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 our legal and regulatory obligations For our legitimate interests or those of a third party

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Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
Marketing our services and those of selected third parties	For our legitimate interests or those

to: ▪ existing and former clients; ▪ third parties who have previously expressed an interest in our services.	of a third party
Credit reference checks via external credit reference agencies	For our legitimate interests or a those of a third party
External audits and quality checks and the audit of our accounts	For legitimate interests or those of a third party. To comply with our 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, 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.

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

- contacting us by letter to Berkeley Square House, Berkeley Square, Mayfair, London W1J 6BD
- contacting us by email to **dataprotection@hudsonmckenzie.com**

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. payroll providers, accountants, tax advisors or other experts;
- other third parties where necessary to carry out your instructions e.g. mortgage provider or
- HM Land Registry in the case of property transactions or Companies House
- credit reference agencies;
- our insurers and brokers;
- external auditors, e.g. in relation to the audit of our accounts;
- 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 our 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

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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.

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;

These transfers are subject to special rules under European and UK data protection law.

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
To be forgotten	The right to require us to delete your personal data in certain situations
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);

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	—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

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 our Data Protection Officer—see below: 'How to contact us'; and
- let us have enough information to identify you *(eg your full name, address and client 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 or 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*].

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Changes to this privacy policy

This privacy notice was published on 30 April 2018. We may change this privacy notice from time to time, when we do we will inform you via email.

How to contact us

Please contact our Data Protection Officer 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	Our Data Protection Officer's contact details
Berkeley Square House, Mayfair, London W1J 6BD dataprotection@hudsonmckenzie.com 020 3318 5794	Berkeley Square House, Mayfair, London W1J 6BD dataprotection@hudsonmckenzie.com 020 3318 5794

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