



## **PRIVACY POLICY**

This privacy policy sets out how Signature Law Ltd uses and protects any information that you provide to us.

Signature Law Ltd is the controller and processor of data for the purposes of the current Data Protection Regulations.

Signature Law Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy statement and as detailed in your Client Care letter and supporting Schedules. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

For Business to Business Clients, individual clients and Contacts such as uninstructed experts and counsel data, our lawful reason for processing your personal information will be on the basis of Performance of a Contract you are entering with us or a Legal Obligation.

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport, driving license and/or bank statements. This data will only be processed for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your express consent.

Signature Law Ltd may change and update this policy from time to time. You have the right to check the details that we hold for you and that you are happy with any changes.

This document provides a widely drafted privacy notice to allow data to be processed under a number of grounds and for a number of purposes. It is subject to be reviewed and amended according to GDPR requirements.

## **What we collect**

We may collect the following information:

- Name, title, D.O.B.
- Contact information including email address.
- Demographic information such as postcode, preferences and interests.
- Bank statements and source of funds checks
- Other information relevant to deal with third parties on your behalf-namely medical experts, country experts. Court, medical professionals and all other bodies

We provide a range of services to clients. We may therefore process a range of personal data, as is appropriate for the performance of services, including contact details, business activities, family information and financial information such as details of income, taxation, financial interests and investments.

As a company providing Legal services and activities, we may sometimes need to process your data to pursue our legitimate business interests, among other things, the nature of which is to provide advice, services and deliverables to our clients, to prevent fraud, for administrative purposes or reporting potential crimes. We will never process your data where these interests are overridden by your own interests.

We typically process personal data in order to manage our relationship with clients, develop our business and services, maintain and develop our IT systems, manage and host events, and to administer and manage our website, systems and applications.

The information we hold, and process will be used for our management and administrative use. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately and to pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings.

The criteria used for determining how long your data will be stored for is governed by the Legal or regulatory requirements.

Much of the information we hold will have been provided by you, but some may come from other sources.

Where we process special categories of information, we will always obtain your explicit consent to those activities unless this is not required by law.

Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you.

If in the future we intend to process your personal data for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information.

As a regulated firm, we are subject to various legal, regulatory and professional obligations that may require us to process and/or retain personal data held on our client files.

Unless the relevant individual has opted out, we may use client business contact details to provide information about our services and activities and events that may be of interest.

## **Security**

We use various measures to protect personal data and other client information, which include monitoring the services provided to clients to detect, investigate and resolve security threats. Such monitoring may involve processing personal data, for example the automatic scanning of email correspondence for threats. Our client take-on procedures involve processing personal data that may be obtained from publicly available sources (such as sanctions lists, criminal convictions databases, and general internet searches) to identify any risks relating to individuals and organisations that may prevent us from working for a particular client or on a particular matter.

## **What we do with the information we gather**

We require this information to understand your needs and provide you with a better service, and in particular for internal record keeping. We may use the information to improve our products and services. We may periodically send promotional emails about other information which we think you may find interesting using the email address which you have provided.

From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customize our website according to your interests.

### **Your Rights**

You have rights in relation to any of your personal data held by us as a data controller. Should you wish to exercise your rights, please contact your usual Signature Law Ltd contact or Sital Somaiya at [sital@signaturelaw.co.uk](mailto:sital@signaturelaw.co.uk)

We will endeavor to respond to any request promptly and within any legally required time limit. Under the current Data Protection Regulations you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, objects to processing as well as in certain circumstances the right to data portability.

If you have provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn. Should you wish to do so, please contact your usual Signature Law Ltd contact.

You also have a right to update your personal data that we hold. If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect. To do so, please contact your usual Signature Law Ltd contact.

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing Sital Somaiya at [sital@signaturelaw.co.uk](mailto:sital@signaturelaw.co.uk)

You may request details of personal information which we hold about you under the current Data Protection Regulations. If you would like a copy of the information held on you please contact Signature Law Ltd.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the Data Protection Regulations with regard to your personal data.

You should refer to the Data Protection Policy which is available from [<https://ico.org.uk/for-the-public/personal-information/>].

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

### **International transfers of personal data**

In the course of running our business and providing services to clients we may transfer personal data to third parties located in other countries or to an international organisation to comply with our legal or contractual requirements, including countries outside the EEA. We have in place safeguards including, encryption and/or pseudonymisation where it is appropriate to do so, we also understand the requirements of confidentiality, integrity and availability for the personal data we process, we make sure that we can restore access to personal data in the event of any incidents, such as by establishing an appropriate backup process. Where appropriate, we implement measures that adhere to an approved code of conduct or certification mechanism to ensure the security of your data and implement Standard Contractual Clauses.

### **Provision of personal data to third parties**

We will only share personal data with third parties where we are legally permitted to do so. We do not provide information to third parties for their own marketing purposes and we do not undertake mailings for third parties. Where we transfer personal data to third parties, we will put in place appropriate contractual arrangements and seek to ensure that there are appropriate technical and organizational measures in place to protect personal data.

We may provide personal data to other Signature Law Ltd branches. We may share personal data with other members of the Signature Law Ltd Network where required for the provision of services to our clients and/or for administrative purposes.

We may also share personal data to third party organizations who assist us in providing services to clients or are otherwise involved in the services we provide to clients.

Like many professional service providers, we use third party providers to support our business and the provision of IT services and services to our clients, such as cloud-based software providers, web hosting/management providers, data analysis providers, and data back-up and security/storage providers. We may transfer personal data to such third parties.

We may be requested or compelled by applicable law and regulation to disclose personal data to third parties such as regulators and law enforcement agencies. We will only provide personal data to such parties where there is a legal requirement or permission to do so.

We may transfer personal data to our advisers as required by law or as reasonably required in the management of our business.