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## Newton Perkins Privacy Policy

This privacy notice is for this website [www.newtonperkins.com](http://www.newtonperkins.com) and governs the privacy of users that visit the site.

We are aware of the importance of maintaining privacy and of keeping our users personal information secure as we seek to comply with relevant data protection laws.

We will be designated as a data controller for any personal information we obtain from you and our responsibility for compliance with data protection laws as far as it regards your personal data shall continue for as long as we hold such data.

This privacy notice describes what personal information we will collect from you as well as any which we may already hold. It will also set out how we hold and process such information and, more importantly, the procedures and controls in place to identify how such information is used.

By agreeing to provide us with your personal information, you are acknowledging that we are at liberty to use that data as set out in this notice. You are able to opt-out of our use of your data and may exercise various rights under data protection law, including the right to have us removing from our records all of the personal information that we hold about you.

To ensure that we keep up with changing legislation and appropriate guidelines it may be necessary for us to make changes amendments to this privacy notice. It is therefore recommended that you check our website periodically, to ensure that you are aware of this policy from time to time.

For the sake of good order our Privacy Notice is sub-divided into sections and you may go to the specific areas that interest you.

We do not knowingly collect data relating to children and so this notice does not relate to children. It is important that you read this Privacy Notice together with any other privacy or fair processing notice we may provide when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

### What Personal Information do we collect?

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 (anonymised data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender
- **Contact Data** includes billing address, correspondence address, email address and telephone numbers

- **Financial Data** includes bank account and payment card details
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- **Profile Data** includes your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## How do we collect your Personal Information

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about our services via our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - give us feedback;
  - engage with automated technologies or interactions.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may receive personal data about you from various third parties and public sources such as Google.

## How we use your personal Data

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data and where we may use consent you have the right to withdraw consent to marketing at any time by Contacting us.

## Purposes for which we process your Personal Information

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful Basis</b>
To register you as a enquiring/potential client	Identity Contact	Consent Legitimate Interests
To provide our services to you including: Managing payment, fees and charges Collect and recover money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: Notifying you about changes to our terms of this Privacy Notice Asking you for a review of our service	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)

<p>To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity Contact Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and measure or understand the effectiveness of the relevant advertising which we serve to you</p>	<p>Identity Contact Profile Usage Marketing and Communications Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, customer relationships and experiences</p>	<p>Technical Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about services or opportunities that may be of interest to you</p>	<p>Identity Contact Technical Usage Profile</p>	<p>Necessary for our legitimate interests (to develop our services and grow our business)</p>

## Newton Perkins Marketing

We may send you marketing information by post or email. We will only market to you if you

have given prior consent for us to do so and with each marketing communication you will have the option to opt-out. Individual employees can object to our processing their data for marketing purposes and we extend this right to corporate subscribers.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and have in place the following personal data control mechanisms:

We will get your express opt-in consent before we share your personal data with any external company for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

### Change of Purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

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

## **Who do we share your personal information with?**

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **How we protect your personal information**

Newton Perkins utilise a number of electronic database tools to manage your personal data. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

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.

## How long we keep your personal information for

We will only retain your personal data 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.

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.

## Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our

use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

## Cookies

Our website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

Cookies are small files saved to a user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the site.

This website uses cookies and where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for website's to obtain explicit consent from users before leaving behind or reading files such as cookies on a users computer / device.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors. If cookies are disabled or refused some parts of this website may become inaccessible or not function properly.

This website also uses tracking software to monitor its visitors to better understand 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 your computers hard drive in order to track and monitor your engagement and usage of the website but will not store, save or collect personal information. You can read Google's privacy notice here for further information [<http://www.google.com/privacy.html>].

Other cookies may be stored to your 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 expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

## Outside of our website

### External Links

Although this website only looks to include quality, safe and relevant external links users should always 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 implications caused by visiting any external links mentioned.

### Adverts and Sponsored Links

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

Clicking on any such adverts will send you to the advertisers website through a referral program which may use cookies. 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 following any external link.

### Social Media Platforms

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. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

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 your request to share a web page respectively through your social media platform account.

## Us and how to contact us

Newton Perkins is registered with the UK Information Commissioner's Office (ICO), the UK supervisory authority for personal data, registration number Z5769166. Our full details are:

Full name of legal entity: Newton Perkins LLP

Name or title of [DPO OR data privacy manager]: Ian Sonnenthal, Partner

Email address: igs@newtonperkins.com

Postal address: Peek House, 20 Eastcheap, London, EC3M 1NP

Telephone number: 0207 456 0700

Registered in England & Wales No. OC368931

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