

Privacy Notice

Please read this privacy notice 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.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union, and the United Kingdom Data Protection Act 2018. We are responsible as 'controller' of that data for the purposes of Data Protection laws.

Our use of your personal data is subject to your instructions, data protection law, other relevant UK and EU legislation and our professional duty of confidentiality.

How your personal data is collected

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

- publicly accessible sources e.g. Companies House or HM Land Registry;
- a third party e.g. sanctions screening providers and client due diligence providers;
- 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 employer and/or trade union, professional body or pension administrators, your doctors, medical and occupational health professionals;
- our website—we use cookies on our website (for more information on cookies, please see our <http://www.cubismlaw.com/legal/privacy-cookies/>)
- our information technology (IT) systems, e.g. case management, document management and time recording systems; door entry systems and reception logs; automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

How and why we use your personal data

Under Data Protection Law, we can only use your personal data if we have a lawful reason for doing so. Most commonly this will be to comply with our legal and regulatory obligations or for the performance of our contract with you or to take steps at your request before entering into a contract. It may also be necessary where we have a legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests.

An example of how we use personal data is conducting checks to identify our clients and verify their identity to comply with our legal and regulatory obligations.

Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including promotions or new services. We have a legitimate interest in processing your personal data for promotional purposes whilst you are an existing client. This means we do not usually need your consent to send you our promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

Please be assured that we will always treat your personal data with the utmost respect and never sell it to other organisations outside the Cubism Group for marketing purposes. You have the right to opt out of receiving promotional communications at any time by:

- by emailing compliancecentral@cubismlaw.com
- using the 'unsubscribe' link in emails

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. barristers, medical professionals, accountants, tax advisors or other experts and consultants;
- other third parties where necessary to carry out your instructions, e.g. your mortgage provider or HM Land Registry in the case of a property transaction or Companies House;
- our group companies;
- credit reference agencies;
- our insurers and brokers; external auditors, e.g. in relation to the Conveyancing Quality Scheme accreditation and the audit of our accounts;
- our banks and external service suppliers, representatives and agents that we use to make our business more efficient, e.g. typing services, marketing agencies, document collation or analysis suppliers;

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 may need to 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. 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 group companies, third party agencies, service providers, representatives and agents as described above.

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 '**Transferring your personal data out of the EEA**'.

How long your personal data will be kept

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 but in any case your personal data will be secured and archived after we have finished working with you. If you wish to see our data retention policy, please contact the Compliance Department at compliancecentral@cubismlaw.com

When it is no longer necessary to retain your personal data, we will either delete, anonymise or archive it in accordance with our data retention policy.

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 our agents who may have offices outside the EEA, with our service providers located outside the EEA, if you are based outside the EEA, where there is an international dimension to the matter in which we are advising you. These transfers are subject to special rules under European and English data protection law. We will ensure the transfer complies with data protection law and all personal data is secure.

Your rights

You have the following rights, which you can exercise free of charge:

- The right to be provided with a copy of your personal data
- The right to require us to correct any mistakes in your personal data
- The right to require us to delete your personal data in certain situations
- 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
- 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
- The right to object at any time to your personal data being processed for direct marketing (including profiling) and in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
- 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

If you would like to exercise any of those rights, please complete a data subject request form, available from our Compliance Department or you can email, call or write to us.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, used or accessed unlawfully. 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.

You have the right to lodge a complaint with the supervisory authority. In the UK this authority is the Information Commissioner Office (<https://ico.org.uk/concerns>). Their telephone number is *0303 123 1113*.

Changes to this notice

This privacy notice was last updated on 15.05.2018. We may change our privacy notice from time to time, when we do we will inform you via our website or by sending you our updated terms and conditions.

How to contact us –Please contact us and by post, email or telephone if you have any questions about this privacy notice or the information we hold about you.

Cubism Law	Data Protection Executive
1 Plough Place, London, EC4A 1DE Tel: 020 7831 0101	Mr David Sedgwick david.sedgwick@cubismlaw.com