

## Our Privacy Policy

North & Letherby values the privacy of those who provide Personal Information to us. This privacy policy (the “Policy”) describes how and why we collect, store and use Personal Information.

This Policy applies to both Personal Information supplied to us either by an individual or by others. We may use Personal Information supplied to us for any of the purposes as set out in this Policy, or as otherwise disclosed at the point of collection.

### Your rights in relation to Personal Information and how to exercise them

Under certain circumstances you have the following rights:

- the right to ask us to provide you, or a third party, with copies of the Personal Information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- the right to request erasure, anonymisation or blocking of your Personal Information that is processed in breach of the law;
- the right to object on legitimate grounds to the processing of your Personal Information. In certain circumstances we may not be able to stop using your Personal Information, if that is the case, we’ll let you know why; and
- withdrawal of consent – while we do not generally process Personal Information on the basis of consent, when Personal Information is processed on the basis of consent an individual may withdraw consent at any time. In the event that you no longer want to receive any marketing material from us, please contact us at the address set out below.

## What basis do we have for processing your Personal Information?

We will only process Personal Information where we have a lawful reason for doing so. The lawful basis for processing Personal Information by us will be one of the following:

- the processing is necessary for the performance of a contract you are party to or in order to take steps at your request prior to you entering into a contract;
- the processing is necessary in order for us to comply with our legal obligations (such as compliance with anti-money laundering legislation);
- the processing is necessary for the pursuit of our legitimate business interests (including that of the delivery and the promotion of our services); and
- processing is necessary for the establishment, exercise or defence of legal claims.

## What Personal Information do we collect and process?

We aim to be transparent about why and how we process Personal Information.

### Business contacts

#### Collection

We process Personal Information about contacts using a secure company database. Personal Information is collected and added to the database by North & Letherby staff, and includes: name, address, email address, business name, telephone numbers, area of business, and other business contact information. The Personal Information may also be collected by virtue of us providing our services to you or at a networking event. In addition Personal Information may also be collected via the North & Letherby website.

#### Use

- For contact and communication purposes: we may use your contact information to send you professional updates that we may circulate from time to time, news about any events we are organising or participating in, and/or other information about us and the services that we provide that we believe may be of interest to you. You can specify your contact preferences by subsequently advising us at any time.
- Making contact details available to North & Letherby staff.
- Performing analytics – such as trends, sales intelligence, marketing effectiveness, uptake and progress.

#### Retention

Personal Information is retained on our database for as long as it is necessary for the purposes set out above (being the length of the business relationship). If a business contact requests to be forgotten their contact details will be deleted from our database. If a business opts out of receiving marketing materials their details will still be retained (as our staff may still be in contact) but marketing materials will no longer be sent.

## Clients and individuals associated with clients

### Collection

We request that our clients only provide Personal Information which is necessary for us to carry out our services.

If we need Personal Information in respect of individuals associated with clients in order to provide services we ask our clients to provide this Policy to the data subjects.

In the majority of circumstances we will collect Personal Information from our clients or from third parties acting on behalf of our clients.

### Use

- Providing professional services: we will use and disclose Personal Information in such a manner as we believe is reasonably necessary to provide our services, to liaise with other professional service providers in relation to matters that we are handling, or because we need to liaise with the opposing party on a matter you have instructed us on.
- Administration: to collect our fees or costs in connection with other legal enforcement, we will use Personal Information to agree payment arrangements, and to collect our fees and costs owing to us in connection with legal enforcement.
- Managing client relationships: providing clients with information on our services and professional updates that we consider may be relevant to them; arranging and hosting events; and identifying where we may make improvements in service delivery.
- Client engagement: as part of our client on – boarding process we carry out certain background searches to verify whether or not there are any potential issues that may mean we cannot work with a particular person.
- Compliance with anti-money laundering regulation: we may use your Personal Information (e.g. evidence of your identity) in order to fulfil our obligations to check the identity of our clients in compliance with anti-money laundering law and regulations, this information will be shared with any relevant staff member required to support that instruction.

### Retention

Our general retention period for documentation created for the purpose of providing services is 6 years. In some instances there are legal and regulatory exceptions which may require documentation to be held for longer or shorter periods. If you require further information please contact us using the details as set out below.

## Job applicants

Please refer to information made available when applying online for further details as to how Personal Information is collected, processed and how long it is retained for.

## Suppliers (including individual contractors)

### Collection

Personal Information, including name, email address, telephone number and other business contact information, is collected to receive services from suppliers, to manage the relationship with the supplier, and for the provision of services to our clients.

### Use

- To receive services from our suppliers: please note that we will use and disclose their Personal Information in such manner as we believe is reasonably necessary to receive and to review the provision of those services from suppliers.
- Services to clients: if a supplier is assisting us in delivering services to our clients we will process Personal Information to manage that relationship.
- Administration: to agree payment arrangements with our suppliers, and to make payments to them.

### Retention

A general retention period of 6 years will be applied unless there are any legal and or regulatory exceptions which may require documentation to be held for shorter or longer periods. If you require further information please contact us using the details as set out below.

## Staff

Personal Information in relation to staff will be held on various internal systems and applications. A privacy notice which sets out the purposes for which Personal Information will be processed and contains information on data subject rights is provided to staff at the commencement of employment. If further information is required please contact our Human Resources department.

## Visitors to the North & Letherby website

### Collection

Personal Information will be collected if you sign up to attend any of our events and/or to receive our marketing literature.

### Use

- Business contacts: if you have signed up to attend one of our events or to receive our marketing literature please see the paragraph above headed 'Business contacts'.

## Who else may have access to your Personal Information?

On occasion, we may need to share your Personal Information with third parties. We will only share Personal Information where we are legally permitted to do so.

Where you supply us with Personal Information as a client, we will assume, unless you instruct us otherwise in writing, that we can disclose your Personal Information in such manner as we believe is reasonably necessary to provide our services (including as described in this Policy), or as is required under applicable law. This might be because, for example, we may pass your Personal Information to third parties such as:

- credit-checking agencies for credit control reasons;
- events: we may need to pass on your Personal Information (e.g. name, company, occupation) to a third party in connection with management of an event, in which case the details will only be used by the third party for that specific purpose;
- business partners, service providers and other affiliated third parties: to enable us to provide our services to you, we may need to share your Personal Information with other staff members, our business partners (including other professional advisers such as accountants or auditors), external service providers and/or overseas counsel. Our arrangements with external service providers currently cover the provision of support services including IT, AML/CDD checks, events management, accounting, document production, business and legal research, marketing and business development and facilities management;
- disclosures required by law or regulation: in certain circumstances, please note that we may be required to disclose Personal Information under applicable law or regulation, including to law enforcement agencies or in connection with proposed or actual legal proceedings.

## How we look after your Personal Information

We have in place appropriate technical and organisational security measures to protect your Personal Information against unauthorised or unlawful use, and against accidental loss, damage or destruction.

We put in place strict confidentiality agreements (including data protection obligations) with our third party service providers.

## Links to other websites

The North & Letherby website may link to other, unaffiliated third party websites. Please note that North & Letherby is not, and cannot, control or be responsible for the content or privacy and confidentiality practices of any third party websites. You must always carefully review the privacy and confidentiality policy of any third party website that you may visit in order to understand how the operators of that website may collect, store and use your Personal Information.

## Updates to this Policy

This Policy was last updated in May 2018. Please check back regularly to keep informed of updates to this Policy.

## Contact information

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