

RAWLINSON & HUNTER LLP DATA PRIVACY POLICY

The Firm comprises Rawlinson & Hunter LLP, Rawlinson & Hunter Audit LLP and R&H Trust Co (UK) Ltd.

Rawlinson & Hunter LLP respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website and use our services. This privacy notice will tell you about your privacy rights and how the law protects you.

Please also use the **Glossary** to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Rawlinson & Hunter LLP collects and processes your personal data.

It is important that you read this privacy notice together with the fair processing notice provided when we initially engage or start providing a new service.

Controller

Rawlinson Hunter LLP is based in the United Kingdom, and as such is registered with the Information Commissioner's Office ("ICO") as a Data Controller under the UK General Data Protection Act . This privacy notice is issued on behalf of Rawlinson & Hunter LLP, so when we mention "we", "us" or "our" in this privacy notice, we are referring to the 'Firm';

Contact us

If you have any questions about this privacy notice, wish to complain about the processing or use of your personal data please contact :

The Data Protection Lead
Rawlinson & Hunter LLP
Q3, The Square
Randalls Way
Leatherhead
Surrey, KT22 7TW

Or privacy@rawlinson-hunter.com

You also have the right to report concerns or make complaints to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Our EEA GDPR Representative. *As we do not have an establishment in the European Economic Area ("EEA"), we have appointed a representative based in Ireland, who you may address if you are located in the EEA to raise any issues or queries you may have relating to our processing of your Personal Data. Our EEA representative is: DLI Corporate Nominees Limited and is located at 31 Morehampton Road, Donnybrook, Dublin 4, Ireland. Our EEA representative can be contacted directly by emailing them at the following address: privacy@dlilaw.com*

Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website (and other websites relating to Rawlinson & Hunter LLP) may include links to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2.The data we collect about you

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

Identity Data includes, but is not limited to, information used to identify a specific individual, such as name, date of birth, place of birth, nationality, passport number and place of issue and principal residential address;

Contact Data includes, but is not limited to postal address, telephone number and email address;

Financial Data includes, but is not limited to, source of wealth, source of funds, personal assets, bank account numbers and income details;

Professional Data includes, but is not limited, information connected to your profession, professional qualifications and business cards;

Transaction Data includes, but is not limited to, details about payments to and from you and other services you have received from us;

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences;

Special Category Data includes, but is not limited to, your political opinions and, or affiliations, so that we can identify whether you are, or are connected to, a politically exposed person; your criminal records or alleged criminal activity; your health and your religion.

Where we need to collect personal data by law, or under the terms of a contract, and you fail to provide that data when requested, we may not be able to act for you.

3. How is your personal data collected?

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

Direct interactions. You may give us your personal information in face to face meetings, by filling in forms or by corresponding with us by post, phone, and electronic mail or otherwise. This includes personal data you provide when you:

- Apply for our services and respond to requests for due diligence documentation
- Subscribe to our industry updates or publications
- Request marketing materials to be sent to you
- Give us feedback or **contact us**.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

- Identity, Contact and Professional Data from publicly available sources such as companies' registers and financial services registers;
- Identity, Contact, Professional and Special Category Data from searches of electronic databases maintained by professional service providers to identify and manage financial, regulatory and reputational risk;
- Identity, Contact, Financial, Professional, Transaction and Special Category Data from your professional advisers including, but not limited to, accountants, tax advisers, bankers and lawyers;
- Identity, Contact, Family, Financial, Professional, Transaction and Special Category Data from your family members or advisors;
- Closed Circuit Television (CCTV). If you visit our offices in the United Kingdom your image may be captured on our CCTV system. We operate a CCTV system for the personal safety of our staff and visitors, to protect our buildings and assets from damage and to support law enforcement bodies in the prevention, detection and prosecution of crime.

4. 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 have entered into with you or during the preparation necessary prior to entering into a contract with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;

- Where we need to comply with a legal obligation.

Please view the **Glossary** on page 6, **lawful basis** to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by **contacting us**.

Purposes for which we will use your personal data

We may use your information to:

- Carry out our obligations arising from contracts entered into by you and us
- Notify you of changes to our services
- Send you communications which you have requested such as changes to legislation

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by **contacting us** at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us for other purposes.

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.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes described above. **Purposes for which we will use your personal data** above.

Internal Third Parties

Other entities within the Rawlinson & Hunter international network

External Third Parties

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.

6. International transfers

During the course of provision of the Services, it may be necessary to transmit elements of your data to other jurisdictions which may not offer such protection as is afforded within the United Kingdom. Where this is necessary we will endeavour to ensure that the offshore organisation is compliant with the requirements of the 'UK General Data Protection Regulation' and in any eventuality we will only share the information necessary for the provision of that Service or those Services.

We may also need to carry out checks to ensure we are not conflicted to act for you. In this case your name will be sent to the offices within our international network <https://www.rawlinson-hunter.com/our-location/>

7. Data security

We have put in place appropriate technical and organisational 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.

8. Where is your data stored?

All data collected to perform our services (including all personal data as specified in our fair processing notices) is held on a number of secure systems depending on the service being provided. These include but are not limited to the following:

- Privately owned server hardware based in our UK offices
- Privately owned dedicated server/storage platforms based in a secure UK datacentre
- Global Third Party Cloud based secure platforms – datacentre locations are selected to ensure the data remains in the UK or EU depending on the provider or service being used.

Where data is provided to third party organisations or governmental agencies in the completion of our services, these organisations are specified in our fair processing notices. If these organisations are based outside of the European Economy Area (EEA) we will inform you before data is transferred.

For further details on where data is stored please contact your engagement partner.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements. Please refer to the latest Fair Processing notice relevant to the service provided.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

You have rights under data protection laws in relation to your personal data. Please see Appendix 1

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by **contacting us**.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

- Service providers acting as processors based in the United Kingdom who provide information technology and system administration services.
- Professional advisers including, but not limited to lawyers, bankers, auditors and insurers.
- Tax authorities, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Service providers who provide anti-money laundering screening services, client-facing application software, archiving and destruction services, business management software, telecommunications services, information technology services and marketing assistance.
- Other entities in the Rawlinson & Hunter network

Appendix 1

YOUR LEGAL RIGHTS

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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above please contact us