



1. Introduction

Coole Bevis LLP (collectively referred to as "**Coole Bevis LLP**", "**we**", "**us**" or "**our**" in this privacy policy) respects your privacy and is committed to protecting your personal data. This privacy policy aims to give you information on:

- how we collect and process your personal data (both when you visit our website and when you make contact with one of our offices or members of staff);
- what we do with it and how we look after it;
- who we disclose it to; and
- what privacy rights you have and how the law protects you.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions 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 policy supplements the other notices and is not intended to override them.

2. Controller

For the purpose of the General Data Protection Regulation (*EU*) 2016/679 and any successor legislation (the "**Data Protection Legislation**"), the data controller responsible for your personal data is Coole Bevis LLP.

We have appointed a data protection officer ("**DPO**") who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the contact details set out at the end of this policy.

3. The data we collect about you and how your data is collected

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 the following personal data:

- **Information you give us:** This is information you give us about you by filling in forms on our website or in person, or by corresponding with us (for example, by post, phone, email or any other method). It includes information you provide when you request the provision of any of our services. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, title, email address, postal address and phone number, date of birth, gender, marital status, personal description and photograph. It may also include your financial and credit card information, feedback and survey responses, as well as your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Information you give us about others:** You may provide us with personal information about other people (for example, members of your family). In these instances, we ask that you have their authority to provide this information to us and that you take reasonable steps to ensure that they are made aware of this privacy policy (for example, by forwarding a copy of this privacy policy to them).
- **Information we collect about you and your computer:** Coole Bevis LLP has designed its website to provide information to visitors about our business and the professional legal services we provide. At times we will collect information about your visit and combine this with other information to understand how all visitors use our site. At other times we will collect personal data or information about you (for example, your email address). In particular, each time you visit our website we may automatically collect the following information:

- technical data, including your 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 the website;
- usage data, including information about how you use our website and services;
- aggregated data, such as statistical or demographic data which enables us to understand what content visitors to our website are consuming and what they are most interested in on the site. Aggregated data may be derived from your personal data, but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.
- **Information we receive from other sources:** We may receive personal data about you from various third parties and public sources (including, for example, business partners, sub-contractors, payment and delivery service providers, advertising networks, analytics providers, search information providers, credit reference agencies, HM Land Registry and Companies House).

We do not generally collect any **Special Categories of Personal Data** about you, except where this information is necessary to perform the contract or agreement we have entered into with you or are about to enter into with 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 generally collect any information about criminal convictions and offences. In each case, we will only collect such information with your prior written consent.

4. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you, or the services that you have requested from us (for example, to provide you with professional legal services). In this case, we may have to cancel or terminate the services we are providing to you, but we will notify you if this is the case at the time.

5. Informing us of changes to your personal data

We regularly review the personal data we hold about you as it is important to ensure that it is accurate and up to date. Your co-operation in helping us to keep your personal data accurate and current is an important part of this. Accordingly, please keep us informed if your personal data changes during your relationship with us.

6. Cookies

We may use cookies or similar tracking devices to monitor your use of the website and to distinguish you from other users of the sites. A cookie is a small data file of letters and numbers which is stored on your computer when you visit or access our website. The cookies we use are typically "analytical" cookies. They allow us to gather information about your use of the website or enable the site to recognise you as an existing user when you access or use the site at a later date. This helps us provide additional functionality to the site or to help us analyse site usage more accurately. For more information about the cookies we use and how to disable them, please see our [Cookie Policy](#).

7. Third-party links & other websites

Our website may, from time to time, include links to third-party websites, plug-ins 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, plug-ins or applications and are not responsible and accept no liability for their privacy statements or for any personal data that may be collected through them. When you leave our website, we encourage you to read the privacy policy or notice of every website you visit.

8. The purposes for which we will use your personal data and how we will use it

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 or agreement we have entered into with you or are about to enter into 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 (unless we have your consent or are otherwise required or permitted to by law). "Legitimate interests" means the interest of our business in conducting and managing our business to enable us to give you the best service 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.
-  Where we need to comply with a legal or regulatory obligation or request to which we are subject.

Please 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.

We have set out below a description of the ways we may use your personal data:

-  To take you on as a new client and to provide the information and services that you request from us.
-  To manage our relationship with you which will include notifying you about changes to our services which may affect you, or to our privacy policy or terms of business, and asking you to leave a testimonial or take a survey.
-  To inform you of seminars and events and make suggestions and recommendations to you about other services that may be of interest to you.
-  To administer our business and the website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
-  To use data analytics to improve our website, services, marketing, client relationships and experiences.
-  To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you.
-  To process any transactions made by you including managing payments, fees and charges and collecting or recovering money owed to us.
-  To protect the rights, property or safety of our business, our clients or others, or in order to enforce or apply our terms of business and other agreements, or to investigate potential breaches.

9. Marketing

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have provided us with your details, requested information from us or received services from us and, in each case, you have not opted out of receiving that marketing.

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

10. Consent

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you.

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

Where you opt-out of receiving marketing messages, this will not apply to personal data provided to us as a result of a service delivery, service experience or other transactions.

11. 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.

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.

12. Disclosure of your personal data

We may have to share your personal data with the following third parties (among others) for the purposes set out in paragraph 8 above:

-  Our employees or other parts of our firm and to other individuals and companies who assist us in supplying our services.
-  Selected service providers including business partners, sub-contractors, analytics providers, search information providers, credit reference agencies and market researchers.
-  Professional advisers, including lawyers, bankers, auditors and insurers who provide legal, banking, accounting, insurance and consultancy services.
-  HM Revenue & Customs, regulators, fraud prevention agencies and other authorities who require reporting of processing activities in certain circumstances.
-  Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

13. Data security

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.

However, please note that the transmission of information via the internet is not completely secure. Although we will do our utmost to protect your personal data, we cannot guarantee the security of your data transmitted to our website.

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.

14. International transfers

Some of our external third party service providers may be based outside the European Economic Area ("**EEA**") so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that your personal data is only transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between Europe and the US.

15. Data retention

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.

In some circumstances we may 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.

16. Your legal rights

Under certain circumstances, you have rights under Data Protection Legislation 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. Please 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. Please 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.

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

You also have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

17. Access to your personal data

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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.

You should anticipate that it may take time to process your application for access as there may be a need to retrieve information from storage and review it in order to determine what information is relevant. Although we try to respond to all legitimate requests within one month, occasionally it may 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.

18. Changes to our privacy policy

Our privacy policy will be reviewed from time to time to take account of new laws and technology, changes to our services and practices and to make sure it remains appropriate to the changing environment.

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you. We recommend that you check back frequently whenever you visit our website to see any

updates or changes to our privacy policy. You may also be asked from time to time to confirm your agreement to our privacy policy.

Any personal data we hold will be governed by the most current version of the privacy policy.

19. How to contact us

Our full contact details are:

Coole Bevis LLP (registered number OC337405)

Postal address: Lanes End House, 15 Prince Albert Street, Brighton BN1 1HY

Email address: dataenquiry@coolebevisllp.com

Telephone: +44 (0) 1273 323321

Questions, comments and requests regarding this privacy policy should be sent to the postal or email address set out above.