

1. About us and the Purpose of this Notice

- 1.1 For the purpose of this Privacy Policy, "Hillier Hopkins", "we", "us", "our" means Hillier Hopkins LLP, and its group affiliates listed at www.hillierhopkins.co.uk/firm-legal-information/
- 1.2 This notice will tell you how we look after your personal data, about your privacy rights, and about our compliance with and your protections under Data Protection Legislation.
- 1.3 In this notice "Data Protection Legislation" means any applicable law relating to the processing, privacy, and use of Personal Data, including the Data Protection Act 2018, the UK GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020.
- 1.4 For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this Privacy Notice.
- 1.5 We have appointed a Data Protection Manager. Our Data Protection Manager is responsible for assisting with enquiries in relation to this Privacy Notice or our treatment of your personal data.

2. Information We Collect and Why We Use it

- 2.1 Personal data is principally collected and processed when supplied by you in the course of our engagement with you under contract. To fulfil our obligations in respect of prevention of money laundering and other financial crime we may send your details to third party agencies for identity verification purposes.
- 2.2 The personal information we collect from you will vary depending on services engaged. The personal information we collect might include your name, address, telephone number, email address, your Unique Tax Reference (UTR) number, your National Insurance number, your passport, bank account details, your IP address, which pages you may have visited on our website and when you accessed them.
- 2.3 In general terms, and depending on which services you engage as part of providing our agreed services we may use your information to:
- contact you by post, portal, email or telephone;
 - verify your identity where this is required;
 - understand your needs and how they may be met;
 - maintain our records in accordance with applicable legal and regulatory obligations;
 - process financial transactions;
 - prevent and detect crime, fraud or corruption.
- 2.4 We would like to keep you informed with important updates, our related services, our opinions and essential reading. We'll also make sure you get advance notice of our events and we will only do this when you have given your explicit consent.

3. Obligation on You When Passing on Personal Data

- 3.1 If any of the details submitted for processing change, it is your responsibility to inform us so that we can update our records as soon as practically possible.

4. Disclosure of Your Information

- 4.1 We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example to process basic bookkeeping. However, when we use third party service providers, we disclose only the information that is necessary to deliver the service. Contractually information is kept secure and used only for the purposes of delivering the required service.
- 4.2 We will not release your information to other third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.
- 4.3 Whilst we store personal data on servers within the UK, we may need to transfer personal data outside the UK. Where we do so, we ensure that appropriate measures are in place to comply with our obligations under data protection legislation.
- 4.4 We will not sell or rent your information to third parties.

5. Your Rights

- 5.1 Under certain circumstances, by law you have the right to:
- **Request access** to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
 - **Request correction** of the personal data that we hold about you.
 - **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 exercised your right to object to processing (see below).
 - **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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - **Request the restriction** of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
 - **Request the transfer** of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.
 - **Withdraw consent.** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time.
- 5.2 If you wish to exercise any of the rights set out above, please contact us.

6. Security of Data

- 6.1 We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 6.2 We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.
- 6.3 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7. Retention of Records

- 7.1 We will retain your personal data for as long as necessary to achieve the purposes set out in this Privacy Notice. You have a legal responsibility to retain documents and records relevant to your financial affairs.
- 7.2 We will retain your records for the duration of our engagement with you under contract. After any termination of the contract between us we will hold your records for the legal or regulatory minimum periods required. We also reserve the right to retain data for longer than this due to the possibility that it may be required to be provided to a regulator or claims insurer outside of these minimum periods.
- 7.3 Records held for the purpose of business updates are held until such time that notice of consent is revoked.

8. Contact Us

- 8.1 If you have any questions about this privacy statement, wish to complain about our use of personal data or exercise one of your rights, please send your correspondence to our Data Protection Manager:

Hillier Hopkins LLP
51 Radius House
Clarendon Road
Watford
Herts
WD17 1HP

Email: DPManager@hhllp.co.uk

- 8.2 You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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