

Privacy Notice – clients and others

This notice is addressed to clients and any others whose personal data we may use. Most of the personal data we process will be obtained directly from you, but we may also acquire personal data about you (and others) from other parties connected with you or your matter. We also obtain data from publicly available sources.

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:

- in anticipation of to perform the engagement (or other agreement) we have with you; or
- where it is necessary for our legitimate interests (or those of a third party) in the operation of our business and we have made an objective assessment that your interests and fundamental rights do not override those interests (for example to manage our relationship with you or where you ask us to provide more details about our business to you); or
- where we need to comply with a legal or regulatory obligation; or
- where you have given us your express consent for use of your data in connection with a particular purpose (for example, anti-money laundering checks); or
- where we have received such data from a third party, such as one of our clients or another advisory firm, and our use of such data is necessary in order for us properly to perform our professional role in any transaction.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Third parties

Please note that our work may require us to pass on such information to third parties such as courts and other public bodies, expert witnesses and other professional advisers, including sometimes advisers appointed by another party to a transaction on which we are advising. We may also give such information to others who perform services for us, such as typing or photocopying. Our practice may be audited or checked by our accountants or our regulator, or by other organisations. We do not normally copy such information to anyone outside the European Economic Area, however we may do so when the particular circumstances of your matter so require and we will ensure that we follow appropriate procedures in so doing. We would expect all third parties in receipt of such information from us to maintain confidentiality in relation to your information.

You have a right of access under data protection law to the personal data that we hold about you. We seek to keep that personal data correct and up to date. You should let us know if you believe the information we hold about you needs to be corrected or updated.

We have appointed Justyn McIlhinney as our representative for the purposes of the Data Protection Act: justyn.mcilhinney@templebright.com

You consent to us retaining such data for longer than the five year statutory period unless you tell us otherwise.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

Data protection – your obligations

If you send us personal data about anyone other than yourself you will ensure you have any appropriate consents and notices in place to enable you to transfer that personal data to us, and so that we may use it for the purposes for which you provide it to us.

Data protection – your rights

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. 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 information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Justyn McIlhinney.

EU Residents

We have appointed IT Governance Europe Limited to act as our EU Representative. If you wish to exercise your rights under the EU General Data Protection Regulation (GDPR), or have any queries in relation to your rights or privacy matters generally please email our Representative at eurep@itgovernance.eu or post your request or query to:

EU Representative, IT Governance Europe, Third Floor, The Boyne Tower, Bull Ring, Lagavooren, Drogheda, Co. Louth, A92 F682.

When contacting our Representative please ensure you include our firm name in any correspondence.

Temple Bright LLP