

## **Privacy Statement**

### **1 About this Privacy Policy**

This Privacy Policy is designed to give you information as to how we, Pannone Corporate LLP, may obtain and process personal data relating to you. This notice should be read together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

As a “data controller”, we are responsible for deciding how we hold and use personal data about you. We are committed to protecting the privacy and security of your personal data.

### **2 Who we are**

Our site [www.pannonecorporate.com](http://www.pannonecorporate.com) is operated by Pannone Corporate LLP, a limited liability partnership registered in England and Wales under company number OC388393, with its registered office address at 378-380 Deansgate, Manchester, M3 4LY.

### **3 The data we may 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 personal information from you through our website, when you contact or request information from us, when you engage us to provide legal or other services, or as a result of your contact with or relationship with any of our staff or clients.

The personal data we may collect and process about you may include:

- Information such as your name, title, the company you work for, your title or position and your relationship to a member of our staff;
- Contact information, such as your email address, postal address and phone number(s);
- Personal information provided to us by or on behalf of our clients or generated by us in the course of providing services to them, which may include “special categories” of data (meaning data revealing racial or ethnic origin, religious or political beliefs, trade union membership, sex life or sexual orientation, data concerning health, or genetic or biometric data);
- Financial information, including bank details and other payment related information;
- Identification documents (which may include copies of identification such as passport and driving licence, and proof of address), as explained to you in our terms of business;
- Technical information relating to your visits to our website or applications or in relation to eshots or other communications we may send to you electronically;
- Information about whether you would like to receive marketing communications from us and your preferences in relation to such marketing;
- Any other information relating to you which you may provide to us.

### **4 How we collect data**

We may collect information about you directly from you, from our clients, from third parties involved in matters we act on for our clients in the course of providing legal services, from other third parties, and from publicly available information. We may also collect information about your use of our website and email communications sent to and from us.

### **5 How we use your data**

We may process your personal data for the purpose of providing legal services to our clients. We may also have a legitimate interest in processing your personal data for our own business purposes, including (without limitation):

- to provide information requested by you;
- to carry out conflict checks to ensure that we are able to provide services to you;
- for fraud prevention, anti-money laundering, and for the prevention or detection of crime;
- to ensure the safety and security of our people and premises (where we also use CCTV);
- to provide and improve our services to you and our clients, including asking clients to participate in surveys;
- to promote our services, including sending legal updates, publications and details of events by email (unless you have opted out of receiving such communications);
- to fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims;
- for the purposes of recruitment.

We may also:

- collect and use aggregated data from the use of our website. Such aggregated data is derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity. For example, we may aggregate data relating to the number of users accessing a specific feature of our site.
- use monitoring tools to improve the effectiveness of our marketing communications, which may include monitoring whether you read legal updates we may send to you, or click on the links to the information that we include in such emails.

We do this by placing a cookie on your device which tracks this activity.

## **6 Cookies**

A cookie is a small data file which is stored on your browser or the hard drive of your computer (or other electronic device) when you access our site.

For more information about the cookies we use and the reasons why we use them, please see our [Cookies Policy](#). You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our site may become inaccessible or not function properly.

## **7 What legal basis do we have for processing your personal data**

We will only process your personal data where we have a lawful basis for doing so. In general, our lawful basis will be one or more of the following:

- where it is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering a contract, for example where you have engaged us to provide legal services to you;
- where it is necessary for the establishment, exercise or defence of legal claims or proceedings;
- to comply with legal and regulatory obligations;
- for our legitimate interests, as set out above in section 5 'How we use your data'.
- in some circumstances, we may also process personal data on the basis that you have provided your consent, for example through instructing us on a matter.

## **8 Marketing emails**

We may send you marketing communications by email and post, where we are permitted to do so by law. You may unsubscribe from receiving such marketing communications at any time by clicking on

the unsubscribe link in the relevant email, or by contacting us at [dataprotection@pannonecorporate.com](mailto:dataprotection@pannonecorporate.com).

## **9 Who may we disclose personal data to**

In providing services to our clients and in complying with our legal obligations, we may share personal data about you or allow third parties to process personal data about you, insofar as we are permitted by law to do so, with the following third parties:

- In respect of any matter with which you may be involved, third parties to the extent that such disclosure is reasonably necessary in connection with that matter, such as the courts, tribunals, barristers, counterparties, experts, and other third parties involved in that matter;
- Suppliers and service providers used by us in providing our services, such as IT service providers (such as hosting providers, providers of software as a service and email service providers), providers to which we outsource support services such as document processing and dictation, translation, data room management, postal services, document storage facilities;
- Debt collection, credit reference and tracing agencies;
- Other legal advisors, who may be based outside the EEA where advice in a particular jurisdiction is required;
- Our auditors, our own legal and other professional advisors, our insurers and insurance brokers;
- Third parties involved in hosting or organising events;
- Government agencies, regulators and other authorities;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

## **10 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, and who will be required to process such personal information only on our instructions.

## **11 How long we keep your data for**

We keep personal data in accordance with our internal retention procedures. The periods for which we keep data depend on the nature of the information and the purpose for which the information is collected and used. Our retention periods take into account legal and regulatory requirements and are subject to change. If you would have any questions in this regard, please contact us using the contact details set out above.

## **12 Links to third party websites**

Our site may include links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to their websites.

## **13 Your rights in respect of your personal data**

The General Data Protection Regulation provides certain rights for data subjects:

- the right to request access to the personal data that we hold about you and how we process it;

- you may have the right in accordance with applicable data protection law to have personal data we hold about you rectified or restricted;
- you may, in some circumstances, have the right to have personal data we hold about you deleted (although note 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);
- in some circumstances, you may have the right to receive or ask for your personal data to be transferred to a third party;
- you have the right to object to how we process your personal data in certain circumstances, including the right to ask us not to process your personal data for marketing purposes;
- where we are processing personal data relating to you on the basis that we have your consent to do so, you may withdraw your consent at any time (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.

If you wish to exercise any of the rights set out above in respect of your personal data, please contact us at [dataprotection@pannonecorporate.com](mailto:dataprotection@pannonecorporate.com).

We may ask you to verify your identity if you make a request to us to exercise any of the rights set out above. 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.

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.

You may have the right to lodge a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance and we shall endeavour to resolve your complaint.

It is important that the personal data we hold about you is accurate and current. Therefore, please keep us informed if your personal data changes during your relationship with us. Where you are our client, it is your responsibility to ensure that all information provided to us about you is complete in all material respects.

## **Changes**

If we change or update this privacy statement, we shall post changes to our website.

## **Contact us**

If you need further information or have any questions or complaints about our privacy policy or practices, please contact our data privacy manager, Amy Chandler, using the contact details below:

[dataprotection@pannonecorporate.com](mailto:dataprotection@pannonecorporate.com)

0800 131 3355

378-380 Deansgate, Manchester, M3 4LY

**Dated 16<sup>th</sup> May 2018**