

BREBNERS

Privacy Notice

Introduction

"**Personal Data**" is any information that relates to a living individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

Brebners processes personal data in the course of its business. Brebners is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations in accordance with the General Data Protection Regulation ("GDPR") and any other data protection legislation in the UK.

This Privacy Notice describes how and why we collect and use personal data and provides information about individuals' rights.

What information does Brebners collect?

Brebners collects and processes a range of information about you. This may include:

- Your personal details such as name, address and contact details, including email address and telephone number, date of birth;
- Details of contacts we have had with you in relation to the provision, or the proposed provision of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make of us;
- information from research, surveys and marketing activities;
- Information we receive from other sources, such as publically available information, information provided by your employer or our clients or information from our member network firms.

Brebners collects this information in a variety of ways.

We obtain personal data about you, for example, when:

- You request a proposal from us in respect of the services we provide;
- You or your employer or our clients engages us to provide our services and also during the provision of those services;
- You contact us by email, telephone, post Etc. (for example when you have a query about our services);
- We meet with you.

Brebners also collects personal data about you from third parties and/or publicly available resources, (for example, internet searches, Companies House).

Data is stored in a range of different places, including in relevant files, and within email and IT systems.

Why does Brebners process personal data?

Brebners needs to process data for purposes necessary for the performance of our contract with you, your employer or our clients and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may process your personal data for the purpose of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you, your employer or our clients and us (which will most usually be for the provision of our services);
- Carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
- Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
- Seek your thoughts and opinions on the services we provide; and
- Notify you about any changes to our services.

Do any third parties have access to my data?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so

"Third parties" includes third-party service providers (including contractors and designated agents).

We will share your personal information within Brebners in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

The following activities are carried out by third-party service providers: IT (and cloud services), professional advisory and support services, administration services, marketing services and banking services.

How secure is my information with third-party service providers?

All our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties in specific instances, for example in the context of the possible sale or restructuring of the business. In these situations we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law, for example ICAEW or HMRC.

Transferring information outside the EEA

Brebners will not store, transfer or process your data outside the European Economic Area ("EEA") unless via a third party service provider who may store, transfer, or process data outside the EEA in carrying out their services.

However, where this relates to a relevant country or territory that has not been deemed by the European Commission to have an adequate level of personal data protection this will be subject to appropriate measures to ensure that an adequate level of protection in accordance with the GDPR is provided.

How does Brebners protect data?

Brebners takes the security of your data seriously. Brebners has internal policies and controls in place in respect of security, which are regularly reviewed to ensure that they are commercially reasonable and appropriate, to prevent data from being accidentally lost or destroyed, used or accessed in an unauthorised way, altered or disclosed. Our policies and controls are designed to limit access to those employees, agents, contractors and other third parties who have a business need to know.

Where Brebners engages third parties to process personal data on its behalf, they do so on the basis of written instructions and are obliged to implement appropriate measures to ensure the security of data.

All employees, agents, contractors and other third parties are subject to a duty of confidentiality.

For how long does Brebners keep data?

We will only retain your personal data for as long as it is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

Your rights

Under certain circumstances individuals have certain rights over their personal data. These include:

- requesting access to and thereby receiving details of personal data held;
- requesting correction of personal data, where appropriate;
- requesting erasure of personal data, where appropriate;
- objecting to the processing of your personal data where Brebners is relying on its legitimate interests as the legal ground for processing; and
- requesting the restriction of processing of your personal data for a period if data is inaccurate or there is a dispute about whether or not your interests override Brebners' legitimate grounds for processing;
- Requesting the transfer of your personal data where processing is based on consent, is carried out by automated means and is technically feasible.

In addition, 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. Thereafter we will no longer process your personal data for the purpose(s) you originally agreed to, unless we have another legitimate basis for doing so in law.

If you believe that Brebners has not complied with your data protection rights please contact us accordingly. We will look into any complaint carefully and promptly and do all we can to explain the position to you.

You also have the right to complain to the Information Commissioner's office (<https://ico.org.uk/>).

What if you do not provide personal data?

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively we may be unable to comply with our legal or regulatory obligations.

Data Controller and contact information

The data controller for Brebners is Brebners.

The Data Protection Point of Contact is John Chamberlain

Further information in respect of Brebners including contact details may be found at www.Brebners.com.

If you have any questions regarding this privacy statement or the manner in which we process your personal data or would like to exercise any of your rights please contact us at:

Head of Data Privacy
Brebners
130 Shaftesbury Avenue
London
W1D 5AR
E-mail: gdpr@brebners.com
Telephone: 020 7734 2244

Changes to this Privacy Notice

Any changes we may make to this Privacy Notice will be provided on our website www.brebners.com.

This Privacy Notice was last updated on 21st May 2018.