

Privacy Policy

We are committed to processing your personal information fairly and transparently and protecting your privacy and security. Our Privacy Notice is designed to help you understand how we collect and use your information.

1. This Privacy Notice sets out the types of personal information we collect, how we collect and process that information, who we may share it with in relation to the services we provide and certain rights and options that you have in this respect.
2. The personal information we collect about you is made up from the information you and others give us during your association with us and during our communications with you.
3. We do not generally seek to collect sensitive personal information. In the event that we do seek to collect sensitive information, we will ask you to explicitly consent to our proposed uses of that information at the time of collection. We use the term “sensitive personal information” to mean information about topics such as personality and private life, racial or ethnic origin, colour, membership of political parties or movements, or other such sensitive topics.
4. If you give us information about another person then we accept it on the understanding that you have made the other person aware of how we will use and disclose their information and the other person has given you permission to provide their details to us. You should not provide us with others' personal information if this is not the case. We accept information about you from other persons on the same basis.
5. The circumstances in which we may collect personal data about you include:
 - a. when you seek legal advice from us or use any of our online client services;
 - b. when you offer to provide, or provides, services to us;
 - c. when you correspond with us by phone, email or other electronic means, or in writing, or when you provide other information directly to us, including in conversation with our lawyers, consultants and staff;
 - d. when you attend our seminars or other events or sign up to receive personal data from us, including training;
 - e. by making enquiries from you or with other organisations with whom you have dealings such as former employers and educational institutions, or from third party sources such as government agencies, a credit reporting agency, information service providers or from publicly available records.

6. Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

7. We may use your personal data only for the following purposes:

a. to register you as a client;

b. to provide and administer legal services or other services or solutions, as instructed by you or your organisation;

c. to administer and manage our relationship with you, including processing payments, accounting, auditing, billing and collection and taking other steps linked to the performance of our business relationship including identifying persons authorised to represent our clients, suppliers or service providers;

d. to carry out background checks, where permitted;

e. compliance with our legal obligations, including maintaining records, compliance checks or screening and recording (e.g. anti-money laundering, financial and credit checks, fraud and crime prevention and detection, trade sanctions and embargo laws). This may include automated checks of personal data you provide about your identity against relevant databases and contacting you to confirm your identity, or making records of our communications with you for compliance purposes;

f. to analyse and improve our services and communications and to monitor compliance with our policies and standards;

g. to manage access to our premises and for security purposes;

h. to protect the security of our communications and other systems and to prevent and detect security threats, frauds or other criminal or malicious activities;

i. for insurance purposes;

j. to process applications for employment;

k. to exercise or defend our legal rights, or to comply with court orders;

l. for any other purposes related and/or ancillary to any of the above or any other purposes for which your personal data was provided to us;

m. to communicate with you to keep you up-to-date on the latest developments, announcements, and other information about our services and solutions (including briefings, newsletters and other information), events and initiatives; to send you details of client surveys, marketing campaigns, market analysis, or other promotional activities; and

n. to collect information about your preferences to personalise and improve the quality of our communications with you.

8. We may process your personal data in connection with any of the purposes set out above on one or more of the following legal grounds:

a. because it is necessary for us to do so to perform your instructions or another contract with you;

b. to comply with our legal obligations as well as to keep records of our compliance processes or tax records;

c. because our legitimate interests, or those of a third party recipient of your personal data, make the processing necessary, provided that those interests are not overridden by your interests or fundamental rights and freedoms;

d. because you have expressly given us your consent to process your personal data in that manner.

9. We will only provide you with marketing related information after you have, where legally required to do so, opted in to receive those communications and having provided the opportunity for you to opt out at any time.

10. We may share your personal data with third parties including certain service providers we have retained in connection with the legal services we provide, such as barristers, consultants, mediators, or experts and other legal specialists such as law firms for obtaining specialist or foreign legal advice, translators, education evaluation services, couriers or other necessary entities;

11. If we have collected your personal data in the course of providing legal services to any of our clients, we may disclose it to that client, and where permitted by law to others for the purpose of providing those services to include with companies providing services for money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared; with courts, law enforcement authorities, regulators, government officials or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process; with service providers who we engage within or outside of Roose+Partners, domestically or abroad, to process personal data for any of the purposes listed above on our behalf and in accordance with our instructions only;

12. If we sell or buy any business or assets we may disclose your personal data to the prospective seller or buyer of such business or assets to whom we assign or novate any of our rights and obligations;

13. When we transfer your information to other countries, we will use, share and safeguard that information as described in this Notice. To provide legal and other services, we may transfer the personal information we collect to countries outside of the EEA which do not provide the same level of data protection as the country in which you reside and are not recognised by the European Commission as providing an adequate level of data protection. We only transfer personal information to these countries when it is necessary for the services we provide you, or it is necessary for the establishment, exercise or defence of legal claims or subject to safeguards that assure the protection of your personal information, such as European Commission approved standard contractual clauses.

Security of your personal data

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.

We have procedures to deal with any suspected personal data breach and will notify you and the ICO of a breach where we are legally required to do so.

Updating personal data about you

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel or amend any instruction, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to info@rooselaw.co.uk.

We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Your Rights in relation to Your Personal Data

You have various rights with respect to our use of your personal data. These are detailed below. If you wish to exercise any of those rights please contact info@rooselaw.co.uk:

- **Access:** You have the right to request a copy of the personal data that we hold about you. There are exceptions to this right, so that access may in some circumstances be denied if, for example, we are legally prevented from disclosing such information.
- **Accuracy:** We aim to keep your personal data accurate, current, and complete. Please let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.
- **Objecting:** In some circumstances, you also have the right to object to processing of your personal data and to ask us to block, erase and restrict your personal data.

- **Porting:** You have the right to request that some of your personal data is provided to you, or to another data controller, in a recognised, machine-readable format.
- **Erasure:** You have the right to erase your personal data when the personal data is no longer necessary for the purposes for which it was collected, or if you consider your personal data have been unlawfully processed.
- **Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority, the Information Commissioner's Office, or to seek a remedy through the courts.

You may, at any time, exercise any of the above rights, by contacting us at info@rooselaw.co.uk.

Right to withdraw consent

If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent. To withdraw your consent please follow the opt-out links on any marketing message sent to you or info@rooselaw.co.uk

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal data for the provision of our legal services.

How long we keep your personal data

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 and, where required for us to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

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 and our regulatory obligations.

Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations.

Changes to our Privacy Notice

We reserve the right to update and change this Notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. Any changes we

Roose + Partners

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may make to our Notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Notice.