

# Adducere

## Data Protection Policy

This Data Protection Policy provides you with information on how we store and process personal data within our business. This includes the measure we take to keep your data secure, and how and which your data may be disclosed to other parties.

### Summary

#### Who does this Policy apply to:

This policy applies to you if you are an existing or enquiring customer of Adducere LLP, one of our suppliers, and advisor to one of our clients or a business to business contact.

#### Who is the controller and processor:

Adducere LLP is both the controller and processor of your personal data:

Adducere LLP

Broadhurst

Old Parks Lane

Smisby

Ashby de la Zouch LE65 2UB

Email: enquiry@adducere.com

### Providing personal data to us a giving consent

Circumstances may arise where we need to ask you to provide personal data to us optionally i.e. to provide consent. This would only be the case where we do not have another lawful basis for doing so. As we do not do any direct marketing, circulars, market research or newsletters we do not anticipate this will happen often.

If this becomes necessary you have the right to withhold or withdraw consent at any time by contacting us using the details provided above. If you do so we will no longer process your personal data unless we have another lawful basis for doing so.

If you are considering withdrawing consent, we would recommend you contact us first so we can explain if this will have an impact on your contract or business with us.

### The personal data we collect

#### Personal Data

We will collect personal data from you throughout the day to day running of our business if you are:

- a client (during both the initial enquiry and delivery stages of your contract with us),
- a supplier,

- an adviser/third party instructed by the client
- or business to business contact.

Depending on the nature of your business with us this may include:

- Your contacts details such as name, title, addresses, telephone numbers and email addresses.
- Data and documentation required for conforming to anti-money laundering laws e.g. Date of birth, nationality, country of residence, Photographic ID, utility bill

### **Criminal Convictions and Offences**

We may hold data relating to criminal convictions and offences in the following circumstances:

- As part of our customer due diligence where we may use customer information to carry out background checks
- If a court order is received containing personal data about criminal convictions, such as fraud.
- If we are contacted by the police in the course of investigating you for an offence.

### **If you fail to provide the personal data**

Where we are required to collect personal data by law, or to perform a contract with you and you fail to provide the personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

## **The lawful basis for processing personal data:**

### **Personal data**

In most cases your personal data will be processed to perform our contract with you and/or to comply with a legal obligation.

Most commonly we will use your data in the following circumstances:

- To perform the contract we have entered into with you or the client you are advising, or in order to take steps and communicate with you as required prior to entering into such contract. (Contract Purposes)
- Where we need to comply with a legal obligation (Legal Purposes)
- Where it is necessary for our or your legitimate interests of those of the client you represent. (Legitimate Interest)

### **Criminal convictions and offences**

We will process personal data relating to criminal convictions and offences where there is a lawful basis to do so (see above) and where EU and UK law requires it. (Legal Purposes)

## The purpose for processing personal data:

Your personal data may therefore be used for one or more of the following purposes:

### Contract Purposes

- To communicate with you to provide the advice specific to your individual contract
- To update our records

### Legal Purposes

- When you contact us regarding exercising your rights under data protection laws
- To provide data to others where necessary for the delivery of your contract and for legal and regulatory purposes and related disclosures.
- We will keep your personal data after your product has closed, where we are required to do so by law. For accounting records, anti-money laundering regulations records, relevant information when a material lawsuit or investigation is reasonably anticipated. Normally for a period of 7 years or until legal advice confirms the records can be deleted.
- For prevention, detection, investigation and reporting of a crime, which may include providing your personal data to fraud agencies.
- To verify your identity for anti- money laundering purposes
- To keep record of communications with you, such as emails, messaging, letters and faxes and any contact through our website or social media. NOTE we do not record phone calls.
- For information security purposes
- To contact you about your business with us, including for debt recovery purposes
- To comply with orders of the courts and for the establishment and defence of legal rights

### Legitimate Interest Purposes

- When you give us your personal data as part of a discussion in a meeting or at a conference or networking event and request we contact you related to the legitimate interests of our businesses. This will apply mostly to developers and investors and agents in the Property Development field in which we operate.
- We will use this data to make the initial requested contact with you. Any contact thereafter will be related to "Contract Purposes" or "Legal Purposes".
- Note that we do not send out direct marketing emails, circulars or newsletters, we will only contact you relating to a specific contract or pre-contract activities or industry specific meetings.

### Consent Purposes

- Only where there is no other legal basis to process your data.

## Sharing personal data

We will share your data with third parties when required by law, when performing a contract with you, when we have a legitimate interest to do so.

### Who will we share your personal data with:

- Third party subcontractors who help us provide our services to you
- Other companies involved in providing services to us
- Our professional advisors e.g. accountants and lawyers
- Governmental, regulatory and taxation bodies
- Fraud prevention or credit reference agencies
- Any other party permitted by law in the following circumstances:
  - To protect the security of our business
  - To comply with orders from a court of competent jurisdictions
  - In an emergency situation in order to protect your vital interests
  - If we sell, merge, restructure or otherwise reorganise our business
  - When dealing with third parties under your instruction or otherwise as required by the law

We do not permit third party processors to use your personal data for their own purposes. We require them to process it in line with our instructions and they too must comply with data protection laws.

## Transferring Data outside the European Economic Area

We do not work outside the UK and can foresee no eventuality when we would need to transfer your personal data outside the European Economic Area.

## Data Security

### How we keep your data secure

Adducere LLP has in place measures designed to keep your data secure, preventing it from being lost, stolen, altered, used, accessed or disclosed in an unauthorised way.

These measures include:

- Limiting access to your personal data to individuals that have a genuine need to access it
- Only allowing those individuals to use your personal data in accordance with this policy
- Having procedures in place to deal with any suspected or confirmed breach and to notify you and any applicable regulator of a breach where we are legally required to do so.

## Your data protection rights

### Your duty to inform us of changes

It is important that your personal data we hold is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### Your rights in connection with personal data

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

- Request access to your data - This enables you to receive a copy of your personal data we hold and to check that we are lawfully processing it.
- Request correction of the personal data we hold about you - We may need to verify the accuracy of new data you provide before updating our records.
- Object to the processing of your personal data - Where we are relying on legitimate interests and there is something about your particular situation that causes you to object to processing on this ground. You also have the right to object if we were to process your data for direct marketing purposes.
- Request the erasure or restricted processing of your data - Where we have no lawful for continuing to process it you can request erasure, or a suspension in the processing of your data. The latter may occur if:
  - You want us to establish the data's accuracy
  - Where our use is unlawful but you do not want us to erase it
  - Where you need us to continue to hold the data, even if we no longer require it, to establish, exercise or defend a legal claim
  - You have objected to our use of the data but need to establish if we have an overriding legitimate ground to use it.
- Not be subject to automatic decision making including profiling - We do not make decisions based on automated processing or profiling
- Request receipt and/or transfer of your personal data to another party – please contact us to discuss your requirements.
- Make a complaint to the Information Commissioners Office (ICO). You have the right to complain to the UK's data protection supervisory authority – the ICO
- Withdraw consent at any time – where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out prior to your withdrawal of consent. If your withdrawal will affect our ability to deliver a contract or service we will advise you that this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights, please contact us using the details provided on the first page of this policy.

### What we may need from you

We may need to request specific information from you in order to confirm your identity and ensure your right to access the information or exercise any of these rights. This is to ensure your data is not disclosed to any person who has no right to receive it.