

HUETT JAMES CONSULTANCY

Privacy Notice

Huett James Consultancy is committed to protecting and respecting your privacy and the security of your personal information.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be used by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.huettjames.co.uk (our **site**) and/or by entering into the contractual arrangement for the supply of our consultancy services and/or by providing us with personal data you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation, the data controller is Huett James Consultancy of 207 Regent Street, London W1B 3HH.

INFORMATION WE COLLECT FROM YOU

We will collect and process information that you give us by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, address, e-mail address and phone number, gender, financial and credit card information.

HOW WE MAKE USE OF THE INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from the contract entered into between you and us and to provide you with the information and services that you request from us;
 - to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
 - If you are an existing client, we will only contact you by electronic means (e-mail or SMS) with information about consultancy services similar to those which were the subject of a previous engagement or negotiations of an engagement with you.
 - If you are a prospective client or other third party individual, we will contact you by electronic means only if you have explicitly consented to this.
 - to notify you about changes to our service.
- **Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

- **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform our consultancy services, or we may be prevented from complying with our legal obligations.

- **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SHARING YOUR INFORMATION WITH THIRD PARTIES

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

You acknowledge and agree that we have the right to share your personal information with:

- Business partners, suppliers and sub-contractors, but only for the performance of our consultancy services;
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into an engagement with you.

All our third-party service providers are required to take 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.

We will also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if Huett James Consultancy or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of engagement and other agreements; or to protect the rights, property, or safety of Huett James Consultancy, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

TRANSFERRING INFORMATION OUTSIDE THE EEA

We will not transfer the personal information we collect about you outside the EEA.

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.

HOW LONG WE RETAIN YOUR PERSONAL DATA

We will only retain your personal information 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. In order to comply with law and to ensure we have the necessary information required in order to resolve future issues that might arise, we retain all personal data for a period of 10 years from collection. 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

- **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes at any point in the future.

- **Your rights in connection with personal information**

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 the Senior Partner in writing.

- **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

- **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

- **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Senior Partner. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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 these websites.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- where we have notified you of the decision and given you 21 days to request a reconsideration;
- where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights;
- in limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA PRIVACY MANAGER

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our data privacy manager at admin@huettjames.co.uk.