

Fox Legal values the privacy of those who provide Personal Data to it and recognises the importance of protecting Confidential Information. This privacy and confidentiality policy (the "Policy") describes how and why we collect, store and use Personal Data and Confidential Information, and provides information about individuals' rights.

This Policy applies to both Personal Data supplied to Fox Legal either by an individual or by others and to Confidential Information supplied by clients or prospective clients. We may use Personal Data and Confidential Information supplied to us for any of the purposes as set out in this Policy, or as otherwise disclosed at the point of collection.

This Policy is an important document. We recommend that you read it carefully and retain a copy for your future reference.

In this Policy, we use the terms:

"Confidential Information" refers to information supplied to Fox Legal by a client or prospective client, which is identified as being confidential at the time of disclosure or would be regarded as confidential by a reasonable person or is protected by a regulatory obligation of confidentiality;

"Engagement Letter" refers to a written document which sets out the terms and conditions of the engagement of Fox Legal and which describes the services to be provided to you by Fox Legal;

"Personal Data" has the meaning set out in EU Regulation 2016/679 (the "GDPR"). This includes any information about an individual from which that person can be identified;

"we", "us", and "our" (and other similar terms) refer to Fox Legal (company number 11155465) with registered office of First Floor, Lipton House, Stanbridge Road, Leighton Buzzard, Bedfordshire, United Kingdom, LU7 4QQ. When dealing with Personal Data, Fox Legal will be the data controller as prescribed under UK law (the "Data Controller");

"you" and "your" (and other similar terms) refer to – as the relevant context dictates – our clients, individuals associated with our clients, contacts, suppliers, job applicants and staff.

Under certain circumstances you have the following rights:

the right to ask us to provide you, or a third party, with copies of the Personal Data we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;

the right to request erasure, anonymisation or blocking of your Personal Data that is processed in breach of the law;

the right to object on legitimate grounds to the processing of your Personal Data. In certain circumstances we may not be able to stop using your Personal Data. If that is the case, we'll let you know and explain why; and

withdrawal of consent – when Personal Data is processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Data where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership).

To receive services from our suppliers: we will use and disclose Personal Data in such manner as we believe is reasonably necessary to receive and to review the provision of those services from suppliers.

Services to clients: if a supplier is assisting us in delivering services to our clients, we will process Personal Data to manage that relationship.

Administration: to agree payment arrangements with our suppliers, and to make payments to them.

A general retention period of 13 years will be applied unless there are any legal and or regulatory exceptions which may require documentation to be held for shorter or longer periods. If you require further information, please contact us using the details as set out in the "Data Controller contact information" section below.

On occasion, we may need to share your Personal Data with third parties. We will only share Personal Data where we are legally permitted to do so.

Where you supply us with Personal Data as a client, we will assume, unless you instruct us otherwise in writing, that we can disclose your Personal Data in such manner as we believe is reasonably necessary to provide our services (including as described in this Policy), or as is required under applicable law. This might be because, for example, we may pass your Personal Data to third parties such as:

- credit-checking agencies for credit control reasons;

- events: we may need to pass on your Personal Data (e.g., name, company, occupation) to a third party in connection with management of an event, in which case the details will only be used by the third party for that specific purpose;

- business partners, service providers and other affiliated third parties: to enable us to provide our services to you, we may need to share your Personal Data with our business partners (including other professional advisers such as accountants or auditors), external service providers and/or overseas counsel. Our arrangements with external service providers currently cover the provision of support services including IT (including but not limited to our cloud technology providers), AML/CDD checks, events management, document production, business and legal research, and secretarial services;

- disclosures required by law or regulation: in certain circumstances, please note that we may be required to disclose Personal Data under applicable law or regulation, including to law enforcement agencies or in connection with proposed or actual legal proceedings.

If we need to transfer your Personal Data outside of the UK (for example in order to obtain overseas legal advice) we will discuss this with you at the time and prior to any such transfer being made.

On occasion, we may want to share your Confidential Information with third parties. We will only share Confidential Information where we are legally permitted to do so.

Where you supply us with Confidential Information, we will assume, unless you instruct us otherwise in writing, that we can disclose your Confidential Information in such manner as we believe is reasonably necessary to provide the services which you have requested from us or as is required under applicable law. Examples of where this may be applicable include the following:

business partners, service providers and other affiliated third parties: to enable us to provide our services to you, we may need to share your Confidential Information with our business partners (including other professional advisers such as accountants or auditors), external service providers and/or overseas counsel. Our arrangements with external service providers currently cover the provision of support services including IT (including but not limited to our cloud technology providers), AML/CDD checks, events management, document production, business and legal research and secretarial services;

disclosures required by law or regulation: in certain circumstances, please note that we may be required to disclose Confidential Information under applicable law or regulation (for instance, for the purposes of completing conflict checks and anti-money laundering checks), to law enforcement agencies, or in connection with proposed or actual legal proceedings.

We have in place appropriate technical and organisational security measures to protect your Personal Data against unauthorised or unlawful use, and against accidental loss, damage or destruction.

We put in place strict confidentiality agreements (including data protection obligations) with our third party service providers.

This Policy was last updated in January 2023. Please check back regularly to keep informed of updates to this Policy.

Fox Legal Limited
First Floor Lipton House
Stanbridge Road
Leighton Buzzard
Bedfordshire
United Kingdom
LU7 4QQ
Email: naomiflynn@flynnlegal.co.uk

While we hope that you will not need to, if you want to complain about our use of Personal Data please send an email detailing your complaint to the above email address.

You also have the right to lodge a complaint with the relevant supervisory authority. Please see further details below:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow
Cheshire
SK9 5AF

www.ico.org.uk

Tel: 0303 123 1113

Tel: 029 2067 8400 (calls in Welsh)

Email: casework@ico.org.uk