

## Privacy Notice

### Who we are

We are Cracknell Law Limited (“**Cracknell Law**”), a specialist commercial law firm providing legal services to companies and individuals.

An integral part of our business is the collection and handling of client and non-client Personal Data. Whenever we receive Personal Data, we are legally obliged to use it in accordance with the laws concerning the protection of Personal Data and we are committed to protecting the information we hold on your behalf during the course of our business operations in accordance with this Privacy Notice.

We are registered with the Information Commissioner’s Office under registration number ZA162225.

### How to contact us

If you have any questions regarding this Privacy Notice or any of our Personal Data handling practices, please email [contact@cracknelllaw.com](mailto:contact@cracknelllaw.com) for more information.

### About this Privacy Notice

The purpose of this Privacy Notice is to explain how Cracknell Law handles Personal Data, including any information provided through our website(s) (the “**Website**”). This Privacy Notice also explains what rights you have in relation to the Personal Data we hold on your behalf.

For the purposes of the General Data Protection Regulations and any other applicable data protection and privacy laws and regulations (“**Data Protection Legislation**”), Cracknell law will be the ‘data controller’ for all Personal Data that we determine the means and purpose of processing.

By “**Personal Data**” we refer to information collected or held by Cracknell law, that identifies and relates to you as an individual.

### What Personal Data do we hold about you?

The Personal Data we may hold about you primarily falls into two categories: Personal Data collected from you during your use of the Website and Personal Data collected during the course of any business relationship we have with you or your employer / the business that you work for (“**Your Business**”).

The table below sets out the Personal Data you or Your Business give to us, Personal Data we may collect from you and Personal Data we may receive from other sources. In each case, such Personal Data may include personal or business contact details.

Personal Data	Use of Personal Data	Lawful Basis
Name, email address, postal address, phone number and any supplementary information about yourself that is provided to us when you contact us with an enquiry through the Website, by phone or in person	<p>To deal with and respond to your query. We only ever request the minimum amount of information we require to contact you, understand your enquiry and provide you with a satisfactory response.</p> <p>To the extent that your query leads to us having a commercial relationship with you or Your Business, we will use such Personal Data to supply our services to you.</p>	To carry out our contract or potential contract with you (or with Your Business) or for our legitimate interests to update our records, examine and develop our business operations.
Name, date of birth and residential address	<p>If you choose to engage our services, we are required by our regulatory body to complete a series of business due diligence checks, conflicts of interest assessments and anti-money laundering checks.</p> <p>This will only be for specific individuals of Your Business (e.g. directors). Once you or Your Business are a client, we will collect only as much Personal Data as required to provide our services.</p>	To carry out our contract or potential contract with you (or with Your Business) or for our legitimate interests to update our records, examine and develop our business operations or recover any debts that may become due.

Name, email address, postal address, phone number and job title when you or Your Business engage our services	To carry out our commercial relationship and supply our services to you or Your Business.  To effectively manage our ongoing relationship. We may be required to notify you about changes to our services, our Terms of Engagement or our Privacy Notice.	To carry out our contract or potential contract with you (or with Your Business) or for our legitimate interests to update our records, examine and develop our business operations or recover any debts that may become due.  If we ask you to provide a customer review, we will always inform you that this is optional and we do so under our legitimate interest to assess our client services and promote our business.
Name and email address	To send you communications about the legal updates, events and services we offer by email.  We will provide a clear unsubscribe option in relation to any such emails.	Necessary for our legitimate interests of promoting our products, events and services to our valued customers and keeping our customers up to date with our latest activities.
Technical information, including your internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, time zone setting, operating system and platform, browser plug-in types and version, the full URL clickstream to, through and from the Website, page response times, download errors, length of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page	To administer and protect our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to improve our Website and to deliver appropriate and effective content to you on our Website.	Necessary for our legitimate interests of keeping our Website up to date and relevant, developing our business and informing our marketing strategy.  We do not use the information collected to identify or profile any visitors to our Website. We process any Personal Data collected as part of this process under the grounds of our legitimate interest to develop our business and adjust our marketing programmes and strategies.
Name and other profile information from your social media profile	To respond to any communication you make with us via our social media accounts.	To carry out our contract or potential contract with you (or Your Business) or for our legitimate interests to update our records, examine and develop our business operations.
Information about you from credit reference agencies	To determine our ability to carry out a commercial contract with you, supply our services to you or Your Business and manage our payment risks.	Necessary for our legitimate interests (to ensure prompt payment of amounts due to us).

### Sharing your information with others

Please be assured that we will not share your information for any other reason unless we are required by law or permitted to do so under this Privacy Notice.

The main circumstances in which we will be permitted or required to disclose this is by law will be:

- 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 any contract between you (or Your Business) and us or to protect the rights, property, or safety of Cracknell Law, our customers, or third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- to HM Revenue & Customs, regulatory and other authorities who require this information for any purpose;
- by court order, to government bodies and law enforcement agencies.

We may also share your Personal Data with third parties in the following ways:

- we may use carefully selected sub-processors to help us collect, store or manage your information. This may include, without limitation, our credit reference agencies, anti-money laundering check services, our accountants, our insurers, professional advisers and our software platform providers. This will always be managed under appropriate data protection terms in accordance with the applicable Data Protection Legislation.
- when we register trade marks on your behalf we will provide contact information relating to Your Business to the Intellectual Property Office and other international registries as part of your trade mark application;
- you may expressly request us to work with other professional advisers that you have engaged (e.g. accounts, financial advisers, other lawyers etc) and we may be required to discuss and share information relating to you with such advisers;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website; and
- if Cracknell law is acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets. We process your Personal Data for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your Personal Data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

## Data retention

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.

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.

If we wish to retain any Personal Data for longer than required under law, contract or our legitimate interests, for the provision of business analytics, we will always completely anonymise this data to prevent any identification of you as an individual from the retained information.

## Protecting your information

We are committed to ensuring that your information is secure and we have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect online. We will limit access to your Personal Data to those employees, agents, contractors and other third parties who need to know such information. All the Personal Data collected by us and stored electronically is held on a secure server in the EEA only.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

## Transfer of data outside of the EU

We shall not transfer any Personal Data to any country outside of the European Economic Area unless we ensure that such Personal Data is subject to an adequate level of protection and appropriate legal safeguards in accordance with Data Protection Legislation.

## Access to your Personal Data

You have rights in relation to any Personal Data that we hold about you. If you wish to access your Personal Data you may make a formal subject access request by contacting Cracknell law.

The information you request must relate to you or another person that you have authority to act on their behalf. Cracknell law will require a confirmation of your ID prior to providing any information about the data we hold. If you are unable to provide sufficient information to prove your ID, Cracknell law reserves the right to refuse your request for access to Personal Data. The rights you have in relation to the Personal Data we hold regarding you are:

- the right to object to processing on the basis of our legitimate interests that is likely to cause damage or distress to you;
- the right to object to processing for direct marketing;
- the right to rectify any inaccuracies in the information we hold;
- the right to erasure of information in specific circumstances;
- the right to request transfer of your information to another controller; and
- the right to object to processing in certain circumstances.

If you wish to exercise any of these rights, please send your request to Cracknell law by emailing [contact@cracknelllaw.com](mailto:contact@cracknelllaw.com). We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Changes to this Privacy Notice

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Data.

Please check this Privacy Notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. The date of the changes will be listed in the 'Last updated' section below. We will endeavour to notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

We recommend that you print a copy of this page for your reference.

## Cookies

This Website uses cookies to help us recognise different users of the Website and to provide users of the Website with a good experience when using it. Please see our **Cookies Policy** for further information.

## How can you make a complaint?

Please note that if you are not satisfied with the processing of your Personal Data as set out in this Privacy Notice, please contact us at [contact@cracknelllaw.com](mailto:contact@cracknelllaw.com).

You have the right to issue a complaint directly with the Information Commissioners Office, the data protection supervisory authority for England and Wales (<https://ico.org.uk/concerns/>).

*Last updated: 25 May 2018*