

## HelloDPO Law Ltd Privacy Notice

Last updated: 10 January 2024

HelloDPO Law Ltd values your privacy and respects the rights you have in relation to your personal data. This privacy notice (**notice**) will inform you about how we look after your personal data, provide details of your privacy rights and how the law protects you.

It is important that you read this notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This notice supplements the other notices and is not intended to override them.

### Content

This notice covers the following areas:

1. What is the purpose of this notice and whose data do we collect?
2. Who is the controller for my personal data and how can I make a complaint?
3. What happens if this notice is updated or my personal data changes?
4. How and why do you process my personal data if I have not provided it to you?
5. What are my rights under data protection law?
6. What personal data do you collect about me?
7. What happens if I fail to provide you with my personal data?
8. How do you collect personal data about me?
9. What happens if I provide you with personal data about another individual?
10. How do you use my personal data?
11. What do you use my personal data for and why?
12. How do you use my personal data for marketing and how can I opt out?
13. Who do you disclose my personal data to?
14. Where do you transfer my personal data to?
15. How do you safeguard my personal data?
16. How long will you use my personal data for?
17. Third-party links on this website
18. What are cookies and how are these used?

### 1. What is the purpose of this notice and whose data do we collect?

- a. This notice gives you information about how HelloDPO Law Ltd collects and processes your personal data when:
- (i) **you are our client** when you sign a written document, for example an engagement letter, which sets out the terms and conditions upon which we will provide services to you under our brands HelloDPO Solutions and/or HelloDPO Law;
  - (ii) **you are not our client**, but we collect your business card from you, you attend one of our events, you sign up to receive our legal updates/ newsletters, you interact with us for the purposes of providing or receiving media and public relations activities for example writing articles or legal updates or speaking at conferences and events;
  - (iii) **your personal data is provided to us via another person or organisation**, for example your CV is passed to us for recruitment activities or when we are acting for a client and they provide us with your personal data as part of the services we are providing to them (please see Section 4 (**How and why do you process my personal data if I have not provided it to you?**)) for more information;
  - (iv) **when you provide goods or services to us** and we need to process personal data in order to enter into an agreement or contract with you and manage that agreement or contract; and
  - (v) **you use this website ([www.hellodpo.com](http://www.hellodpo.com)) (our website)** and you provide personal data through the use of our website including when you sign up to our newsletters/updates and events.
- b. Our services and our website are not intended for children and we do not knowingly collect personal data relating to children.

## 2. Who is the controller for my personal data and how can I make a complaint?

- a. HelloDPO Law Ltd (registered number 11210309) is the controller for your personal data (referred to as "**HelloDPO Law**", "**we**", "**us**" or "**our**" in this notice). HelloDPO Law is registered with the Information Commissioner's Office (**ICO**) with registration number ZA355397. You have the right to make a complaint about the processing of your personal data or any of your rights at any time to the ICO, ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO.

- b. If you have any questions about this notice, including any requests to exercise your legal rights, please contact us using the details set out below:

t: +44 (0)203 778 0737

e: [hello@hellodpo.com](mailto:hello@hellodpo.com)

a: HelloDPO Law Ltd, 23 Cottingham Way, Thrapston, Northants NN14 4PL

### 3. What happens if this notice is updated or my personal data changes?

This version of the notice was last updated on the date stated at the beginning of the notice and any historic versions can be obtained by contacting us at [hello@hellodpo.com](mailto:hello@hellodpo.com). We will publish any changes to this notice on our website and where necessary we will also send you a copy via post or email. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 4. How and why do you process my personal data if I have not provided it to you?

In limited circumstances we may be required to process your personal data where you have not provided this directly to us. These circumstances are most likely to arise as follows:

- a. **When we are acting for our client and in order to provide advice to them**, we may need to process your personal data, for example, if they require advice in relation to any data subject rights requests. If we are required to process your personal data in this way, it may not be appropriate for us to provide a separate privacy notice to you as we do not have a direct relationship with you, and this may cause us to breach obligations of confidentiality that we owe to our client. We have set out in **Section 10 (How do you use my personal data?)** and **Section 11 (What do you use my personal data for and why?)** these limited circumstances and our right to use your personal data in this way.
- b. **When we receive your CV or other personal data related to your educational or employment history** for the purposes of contacting you about a position at HelloDPO Law before you apply through our recruitment process. If we process your personal data for these purposes, this notice only covers how we use your personal data to contact you and a separate privacy notice will be provided to you when you apply through our recruitment process.

### 5. What are my rights under data protection law?

- a. You have a number of rights in relation to how we use your personal data, these are set out below in more detail:
- (i) **Your right to request access to your personal data.** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
  - (ii) **Your right to request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate personal data we hold about you corrected, though we may need to verify the accuracy of the new personal data you provide to us.
  - (iii) **Your right to request erasure of your personal data.** This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing under **Section 5a(iv) (your right to object)**, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure because of specific legal reasons which will be notified to you, if applicable, at the time of your request.
  - (iv) **Your right to object to processing of your personal data.** This enables you to object to the processing of your personal data where we are relying on our legitimate interest (or that/those of a third party) and you want to object to processing on this ground as you feel the processing impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the absolute right to object where we are processing your personal data for direct marketing purposes.
  - (v) **Your right to request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the personal data is unlawful but you do not want us to erase it; (c) where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.
  - (vi) **Your right to data portability.** This enables you to request transfer of your personal data to you or to a third party. We will provide your personal data (to you, or a third party you have chosen) in a structured, commonly used, machine-readable format. Please note that this right

only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- (vii) **Your right to withdraw consent.** This right arises 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 before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you (if consent is necessary to the provision of such products or services). We will advise you if this is the case at the time you withdraw your consent.
- a. If you wish to exercise any of the rights set out above, please contact us using the details set out in **Section 2 (Who is the controller of my personal data and how can I make a complaint?)**. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee for administrative costs if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- b. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information to speed up our response.
- c. We try to respond to all legitimate requests within one calendar 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. For more information on the rights set out above and when they apply, please contact us at [hello@hellodpo.com](mailto:hello@hellodpo.com) or see the guidance from the UK Information Commissioner on individuals' rights.

## 6. What personal data do you collect about me?

- a. **Personal data** means any information about an individual from which that person is identifiable or can be directly or indirectly identified.
- b. **Special categories of personal data** means any information about you which includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any special categories of personal data about you. We may be required to

collect information about criminal convictions and offences for example when we undertake anti-money laundering, anti-terrorism checks, or background checks, however, we will tell you if this is the case at the time of collection.

- c. We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows. The terms below are mainly used in **Section 11 (What do you use my personal data for and why?)** to explain why we use the personal data in the way we do:
- (i) **Communication** this includes the channel and method by which we communicate with you and the content of the communication.
  - (ii) **Contact** this includes billing and correspondence addresses, personal and professional email address, contact information in social media profiles, personal and professional telephone numbers and business cards.
  - (i) **Employment information** this includes details of the organisation you work for, what sector you work in and your job role/title.
  - (ii) **Financial** this includes bank account details.
  - (iii) **Identity** this includes name, marital status, title, date of birth, gender, photograph and/or image, national insurance number, passport or identity card details and driving licence details.
  - (iv) **Information contained in a CV** this may include information about schools and universities you attended, your qualifications and experience, information about current and past employment and your interests.
  - (v) **Other third-party personal data** this includes personal data about individuals who are related to clients for whom we act, for example when we are fulfilling or advising on data subject rights requests or complaints etc.
  - (vi) **Marketing** this includes your preferences in receiving marketing from us.
  - (vii) **Transaction** this includes details about payments to and from you and other details of services we have provided to you and details of services you provide to us where you are a supplier or provider of goods and services.

- (viii) **Technical** this includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions and operating system and platform.
- (ix) **Usage** this includes information about how you use our website and services.

## 7. What happens if I fail to provide you with my personal data?

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to decline to provide services to you or enter into a contract with you, but we will notify you if this is the case at the time.

## 8. How do you collect personal data about me?

We use different methods to collect personal data from and about you including through the following interactions set out below:

a. **Direct interactions.** You give us your Identity, Communication, Contact and Financial data by filling in forms or by corresponding with us by post, phone, email or online (including via social media). This includes personal data you provide when you:

- (i) request information about our services;
- (ii) enter into a contract for the provision of services with us;
- (iii) subscribe to our blogs or publications;
- (iv) request marketing to be sent to you;
- (v) give us your business card and contact details;
- (vi) send us your CV or other similar employment/education information; or
- (vii) give us some feedback.

b. **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical data about your equipment, browsing actions and patterns. We

collect this personal data by using a cookie, server logs and other similar technologies. You can see a copy of our cookie notice by clicking [here](#).

c. **Third parties.** We receive personal data about you from the third parties below:

- (i) Other third-party personal data from our clients and their agents when we are providing or contemplating providing services to our clients.
- (ii) Contact, Identity, Financial and Transaction data from providers of technical, payment and delivery services based outside the UK; and
- (iii) Contact and Identity data from recruiters and head-hunters when they provide us with your CV.

d. **Via our case management, document management and time recording systems.**

e. **Publicly available sources.** We receive personal data about you from the public sources as set out below:

- (i) Identity and Contact data from publicly available sources such as Companies House and the Electoral Register; and
- (ii) Identity and Contact data from publicly available sources for sanctions screening and anti-money laundering purposes.

## 9. What happens if I provide you with personal data about another individual?

In order for us to provide our services to you, we may need to process personal data about other individuals, for example your employees or another individual. In this situation we will not have direct contact with those individuals, and it will not be appropriate for us to provide them with a copy of this notice. **You are required to ensure that you have satisfied all legal requirements before passing this personal data to us, including providing them with a copy of this notice and you must ensure that we can use any personal data that you pass to us in accordance with this notice and any applicable data protection legislation.** You must also comply with any data protection provisions set out in the letter of engagement, terms of business or contract we have entered into with you.

## 10. How do you use my personal data?



We will only use your personal data when the law allows us to. We may process your personal data without your knowledge or consent where this is required or permitted by law. Most commonly, we will use your personal data in the following circumstances and for the following purposes:

- a. **Legal or regulatory obligation** – to comply with a legal or regulatory obligation to which we are subject, for example carrying out anti-money laundering checks;
- b. **Legitimate interest** – where it is in our legitimate interests or that of another third party. We will always make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [hello@hellodpo.com](mailto:hello@hellodpo.com);
- c. **Performance of contract** – where it is necessary for us to process your personal data for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract; and
- d. **Consent** – generally we do not rely on consent as a legal basis for processing your personal data. If we do, you can withdraw your consent at any time. If your consent relates to the use of cookies, you can withdraw consent by clicking on the paper clip icon at the bottom left corner of the screen on each page of our website, which will take you to the cookie tool. It may be necessary to refresh the page for the updated settings to take effect. Please see our cookie notice for further details on our use of cookies. With regard to consents for marketing, you can withdraw these by checking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing communications sent to you or by contacting us at [hello@hellodpo.com](mailto:hello@hellodpo.com)

## 11. What do you use my personal data for and why?

- a. We have set out in the table below, a description of all the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data. Please contact us at [hello@hellodpo.com](mailto:hello@hellodpo.com) if you need details about the specific legal basis we are relying on where more than one legal basis has been set out in the table below.

- b. We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [hello@hellodpo.com](mailto:hello@hellodpo.com).
- c. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Individual	Purpose for processing	Data used	Legal basis relied on
Clients	To take you on as a new client and to open a new file or matter for you and set up billing procedures and keeping our files up to date.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legal and regulatory obligation</li> <li>• For our legitimate interests – so that we can keep in touch with clients</li> </ul>
Clients	To undertake relevant anti-money laundering, anti-corruption, anti-terrorism and identity checks and conflict checks to ensure we can act for you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> <li>• Legitimate interests – to prevent conflicts which are commercial in nature rather than legal</li> </ul>
Clients	To deliver services to you including providing advice, managing payments, fees and charges and collecting and recovering any money owed to us	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Communication</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests - to recover debts due to us</li> </ul>
Clients	To manage our relationship with you including notifying you about changes to our terms or this notice and other, client related notifications which do not constitute marketing	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legal and regulatory obligation</li> <li>• Legitimate interests – to provide a good service to you</li> </ul>

Clients	To send you our newsletter, to invite you to seminars, events and/or workshops and to manage your attendance at those seminars, events and/or workshops	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests - to grow and expand our business</li> <li>• Consent where communications are electronic unless the soft opt-in is used</li> </ul>
All data subjects covered by this notice	To prevent and detect fraud against you or us.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Other third-party personal data</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests – to minimise fraud which could be damaging for you and/or us.</li> <li>• Legal and regulatory obligation</li> </ul>
All data subjects covered by this notice	To enforce legal rights or defend or undertake legal proceedings	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Financial</li> <li>• Other third-party personal data</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with our legal and regulatory obligations</li> <li>• Legitimate Interests, to protect our business, interests and rights</li> </ul>
All data subjects covered by this notice	Gathering and providing information required by or related to audits, enquiries or investigations by regulatory bodies	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Financial</li> <li>• Other third-party personal data</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> </ul>

Prospective clients	To contact you to provide you with information about us and our services which you have requested when you are not our client	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests - to respond to requests for information from you and to grow our business</li> </ul>
Prospective employees / website users	To contact you to provide you with information about us, our services and any vacancies which you have requested and to manage any application made to work with us.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Information in a CV</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests - to respond to request for information from you about our vacancies/ to progress your job application to grow our business</li> </ul>
Prospective clients, employees, and website users	To send you our newsletter, invite you to seminars, events and/or workshops and to manage your attendance at those seminars, events and/or workshops	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests - to grow and expand our business</li> <li>• Consent when such communications are electronic unless the soft opt-in is used</li> </ul>
Suppliers and providers of goods and services to us	To set you up as a supplier or provider on our systems and enter into a contract with you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Financial</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legal and regulatory obligation</li> </ul>
Suppliers and providers of goods and services to us	To undertake relevant anti-money laundering, anti-corruption, anti-terrorism and identity checks and conflict checks to ensure we can use your services	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Financial</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> </ul>
Suppliers and providers of goods and services to us	To operate our contract with you including managing payments, fees and charges and collecting and recovering any money owed to us	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Communication</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests - to recover debts due to us</li> </ul>

Suppliers and providers of goods and services to us	To manage our relationship with you including notifying you about changes to our terms or this notice	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communication</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legal and regulatory obligation</li> <li>• Legitimate interest – to ensure our relationship with suppliers/providers operates smoothly</li> </ul>
Other individuals	To contact you (when you or someone else has provided your contact details) when we are acting against you or with you on a matter	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> <li>• Legitimate interest – to provide services to our client we may, for example, need to contact lawyers for opposing parties or engage experts.</li> </ul>
Other individuals	To engage and interact with you when you have asked us to create any articles or public relations material or when we are engaged to speak at any seminars or events	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests – to enable us to grow and publicise our business</li> </ul>
Other individuals	To provide services to our client when personal data of a third party has been passed to us for the purposes of providing advice on a matter	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Other third-party personal data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> <li>• Legitimate interests – in order to provide advice/services to our client</li> </ul>
Other individuals	To undertake conflict checks to ensure we can act on behalf of our client	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> <li>• Legitimate interests – to prevent conflicts which are commercial in nature rather than legal</li> </ul>

All data subjects covered by this notice	To administer and protect our business and our website including, ensuring the confidentiality of sensitive information, protecting the security of our systems and data, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> <li>• Legitimate interests – to run our business, provide administration and IT services, network security and to prevent fraud</li> </ul>
All data subjects covered by this notice	To respond to communications submitted through the contact form	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Employment information</li> <li>• Communication</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests -to respond to you in relation to your communication as a part of running and growing our business.</li> </ul>
All data subjects covered by this notice	To track how users use this website as well as where they come from. Please see the cookie notice for more details	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> </ul>

## 12. How do you use my personal data for marketing and how can I opt out?

- a. We may use your Identity, Contact, Communication and use of our services data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or have engaged us for services and, in each case, you have not opted out of receiving marketing communications.
- b. You can ask us to stop sending you marketing communications at any time by checking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing communications sent to you or by contacting us at [hello@hellodpo.com](mailto:hello@hellodpo.com).

## 13. Who do you disclose my personal data to?

- a. We may have to share your personal data with the parties set out below for the purposes set out in the table in **Section 11 (What do you use my personal data for and why?)**:
- (i) Service providers who provide IT and system administration services and access to platforms we use for operational purposes to run our business;
  - (ii) Professional advisers including lawyers, barristers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services to us and where these services are needed in relation to providing advice/services to our clients;
  - (iii) HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances, for example to ensure we are complying with legal and regulatory obligations;
  - (iv) Third parties who require access to the personal data we process for the purposes of the prevention or detection of crime or for the purposes of legal proceedings;
  - (v) Fraud prevention agencies and credit reference agencies based in the UK for the purposes of undertaking anti-money laundering, anti-terrorism and other financial checks to ensure we are complying with our legal and regulatory obligations;
  - (vi) External auditors who provide auditing and similar compliance services to us to ensure we are complying with our legal and regulatory obligations when we provide services to you, process your personal data or where we are certified under any relevant schemes or certifications;
  - (vii) Financial providers who provide us with financial services and facilities; and
  - (viii) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this notice.
- b. We require all third parties to respect the security of your personal data and to treat it in accordance with the law and the terms of the contract we have in place with them where they are our third-party service providers. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **14. Where do you transfer my personal data to?**

- a. Some of our external third parties are based outside the UK/EEA so their processing of your personal data will involve a transfer of personal data outside the United Kingdom (UK) and/or the European Economic Area (EEA). Whenever we transfer your personal data out of the UK and/or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is in place:
  - (i) We may transfer your personal data to countries that have been granted an adequacy decision by the European Commission and/or an adequacy regulation by the UK Secretary of State (as applicable) confirming that the country in question provides an adequate level of protection for personal data; or
  - (ii) we may use specific contracts approved by the European Commission and/or the UK (as applicable) which ensure that personal data is adequately protected. When we rely on this measure we will ensure that the third-party can comply with the provisions of such contracts and we have confirmed that the country to which the personal data is transferred provides enforceable data subject rights and effective legal remedies for data subjects are available there; or
  - (iii) a specific exception applies under applicable data protection law.
- b. Please contact us at [hello@hellodpo.com](mailto:hello@hellodpo.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and/or EEA.

#### **15. How do you safeguard my personal data?**

- a. We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.
- b. We also have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **16. How long will you use my personal data for?**



- a. 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.
- b. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.
- c. Details of retention periods for different aspects of your personal data are set out in the table below:

Data type	Retention period
Client	As a general rule we will keep your personal data for 12 years from the date your file was closed. We may however be required to keep your personal data for longer or shorter if we are required for legal or regulatory purposes
Prospective clients/individuals receiving marketing	As a general rule we will only keep your personal data for 3 years from the last communication with you whilst we are still using your personal data for the purposes for which it was obtained, for example sending marketing to you, unless you opt-out of marketing or change your preferences which you can do so at any time
Prospective employees and/or contractors	We will only retain your personal data, for example your CV and any Contact and/or Identity data, for a period of 3 months after our last communication with you, unless you have asked us to keep your personal data on file for longer in case a suitable vacancy arises, or you become an employee or contractor, in which event, the relevant privacy notices will apply.
Other individuals	If your personal data forms part of a client matter, as a general rule we will keep your personal data for 12 years from the date your file was closed. We may however be required to keep your personal data for longer or shorter if we are required for legal or regulatory purposes
All website visitors	Please see our <a href="#">cookie notice</a> for details of how long personal data is retained for when you visit our website



## **17. Third-party links on this website**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **18. Cookies**

Please see our [cookie notice](#) for details of the cookie we use on our website.

**End of notice**