



DATA PROTECTION NOTICE

Introduction

Welcome to Grande Stevens International LLP's data protection notice.

Grande Stevens International LLP (hereinafter “GSI”) respects your privacy and is committed to protecting your personal data.

This data protection notice will inform you as to how we collect and look after your personal data, will tell you who the data controller is and will tell you about your privacy rights and how the law protects you.

Please also use the Glossary in paragraph 10 below to understand the meaning of some of the terms used in this data protection notice.

This data protection notice must be read in conjunction with our letter of engagement and our terms of business.

1. Important information and who we are

Purpose of this data protection notice

This data protection notice aims to give you information on how GSI collects and processes your personal data (a) when you instruct us to provide you with legal services, (b) for administration purposes, (c) for legal and regulatory compliance, (d) for marketing (including telling you about our regular services, legal updates, clients seminars, events and publications) and (e) when you visit our website.

It is important that you read this data protection notice together with any other privacy notice or fair processing 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 data. This data protection notice supplements the other notices and is not intended to override them.

Controller

GSI is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this data protection notice).

GSI is not required under the EU General Data Protection Regulation (“GDPR”) to appoint a Data Protection Officer and, following a detailed analysis, does not consider it appropriate to do so on a voluntary basis. GSI has, however, appointed a Data Protection Manager (“DPM”) who is responsible for overseeing GSI’s compliance with the GDPR and any other applicable data protection legislation and regulation. In addition, our Compliance Officer for Legal Practice oversees compliance with our professional responsibilities and with legislative requirements. If you have any questions about this data protection notice, including any requests to exercise your legal rights, please contact the DPM using the details set out below.

Contact details:

Full name of legal entity:	Grande Stevens International LLP
Name or title of DPM:	Vincenzo Lanni
Email address:	info@grandestevensint.co.uk
Postal address:	28-29 Dover Street, London W1S 4NA

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the data protection notice and your duty to inform us of changes

This version was last updated on 16 May 2019 and historic versions can be obtained by contacting us.

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.

Third-party links

Please note that 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 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 data protection/privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

In carrying out our services and activities, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes home address, billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details concerning legal services that we have provided to you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this data protection notice.

In limited circumstances, we may collect **Special Categories of Personal Data** about you (this 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), as well as information about criminal convictions and offences. Should we need to collect any Special Categories of Personal Data from you, we will provide you with appropriate explanation on the reasons we need to do so.

If you fail to provide 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 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 our legal services). In this case, we may have to stop providing our services to you, but we will notify you if this is the case at the time.

3. How your personal data is collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial and Transaction Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - request our legal services;
 - make an enquiry regarding our services;
 - request marketing to be sent to you; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) search information providers based inside or outside the EU.
 - Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

We may include documents created or received in the course of providing our services in databases that we use or maintain and use them for the purposes of our business. Those databases may comprise hard copy documents stored and retrieved manually or electronically.

4. How we use your personal data

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

- where this is a necessary part of the legal services that we undertake for you;
- where we need to perform the contract we are about to enter into, or have entered into, with you;
- where we are required to do so by operation of law;
- where we need to comply with a legal or regulatory obligation;
- for the purpose of anti-money laundering identity checks and credit checks;
- to help us manage our business;
- where we need to contact you in regard to you accessing GSI's website;
- where we need to reply to any queries you have made to us;
- where we wish to inform you of any events that we may organise;
- where we need to provide you with information or services that you request from us or which we feel may interest you (where you have consented to be contacted for such purposes); and
- 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 use the information you provide (including personal data) primarily for the provision of legal services to you, but also for related purposes including creating and maintaining client records, issuing invoices, collecting payments and debts, analysis for the purpose of practice management, statutory returns, insurance proposals and legal and regulatory compliance. Our work for you may require us to share information with third parties such as other advisers or persons in our associated offices (please see below for further details).

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal or regulatory obligation
To undertake and carry out the legal services you have requested from us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Special Categories of Personal Data	(a) Performance of a contract with you (b) Necessary to comply with a legal or regulatory obligation (c) Necessary for our legitimate interests
To manage our relationship with you which will include notifying you about changes to our terms of business or data protection notice	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal or regulatory obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation) (b) Necessary to comply with a legal or regulatory obligation
To deliver relevant website content to you	(a) Identity (b) Contact (c) Marketing and Communications (d) Technical (e) Usage	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any other company for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a provided service, warranty registration, service experience or other transactions.

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

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

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- 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 data protection notice.

We may use third parties, within or outside the European Economic Area to perform certain support and legal services on our behalf in relation to your matter such as word-processing, copying, printing, translation, conveyancing, legal research and corporate due diligence services. The work which is outsourced may include Special Categories of Personal Data as defined in the GDPR and in the Data Protection Act 2018.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

We will take appropriate measures to maintain client confidentiality by ensuring that third parties providing support services and legal services, will have signed a confidentiality agreement and agreed to act as a data processor in respect of any personal data in terms which enable us to comply with the GDPR and the Data Protection Act 2018.

6. International transfers

We do not transfer your personal data outside the European Economic Area.

7. Data security

We have put in place appropriate security measures 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.

We have put 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.

8. 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, regulatory, 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.

By law we have to keep basic information about our clients (including Contact and Identity) for a minimum of 7 years and up to 12 years after completion of the matter to which they relate (other than duplicates which may be destroyed later) for regulatory and anti-money laundering purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

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.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please find a list and explanation of such rights in paragraph 10 below.

If you wish to exercise any of the rights set out in paragraph 10 below, please contact us.

No fee usually required

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 if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these 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 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 in relation to your request to speed up our response.

Time limit to respond

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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We 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.

Performance of Contract means processing your data where it is necessary 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.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies or firms associated with GSI and who are based in Italy and undertake leadership reporting.

External Third Parties

- Service providers based in the United Kingdom who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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 (see below), 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 of erasure for specific legal or regulatory reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

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 data is unlawful but you do not want us to erase it; (c) where you need us to hold the 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 data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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.

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 before you withdraw your consent. If you withdraw your consent, we may not be able to provide our services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to withdraw your consent to the processing of your personal data, please contact our Data Protection Manager on +44 (0)20 3862 2900 or at info@grandestevensint.co.uk.