

DATA PROTECTION PRIVACY NOTICE (SUPPLIERS)

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during the time we provide our products and services to you and after we cease to provide such products and services. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

1. WHO COLLECTS THE INFORMATION?

Lanyon Bowdler LLP (referred to as “we”, “us” or “our” in this privacy notice) is a 'data controller' and gathers and uses certain information about you.

2. DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information.

3. ABOUT THE INFORMATION WE COLLECT AND HOLD

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the table set out in the Schedule.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

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 receive goods or services from you). In this case, we may have to cancel an order for a product or service you have with us but we will notify you if this is the case at the time.

4. DISCLOSURES OF YOUR PERSONAL DATA

As outlined in the table in the Schedule, we may need to share your personal data with third parties, examples of which are listed below:

- 4.1 External third parties as follows:
- 4.1.1 Service providers who provide IT and system administration services.
 - 4.1.2 Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - 4.1.3 HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
 - 4.1.4 Identity verification and providers of insolvency and credit information.
- 4.2 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 privacy notice.

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 who are data processors 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.

5. **INTERNATIONAL TRANSFERS OF INFORMATION**

We do not ordinarily transfer your personal data outside the UK.

However, if we do need to transfer your personal data out of the UK, we will only transfer your personal data to a country or international organisation outside the UK where:

1. the UK government has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
2. there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
3. a specific exception applies under data protection law

These are explained below.

(a) **Adequacy decision**

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:

1. all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
2. Gibraltar; and
3. Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.

The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

(b) Transfers with appropriate safeguards

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects. The safeguards will usually include using legally-approved standard data protection contract clauses. In relation to transfers between offices or other companies within a group, the safeguards may instead include legally binding rules and policies (known as binding corporate rules), which have been approved by the UK data protection regulator.

(c) Transfers under an exception

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under data protection law, e.g.:

1. you have explicitly consented to the proposed transfer after having been informed of the possible risks;
2. the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
3. the transfer is necessary for a contract in your interests, between us and another person; or
4. the transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

6. WHERE INFORMATION MAY BE HELD

Information may be held at our offices and those of third party agencies, service providers, representatives and agents as described above. Information may be transferred internationally to other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above.

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

7. HOW LONG WE KEEP YOUR INFORMATION

We keep your information during and after your custom with us for no longer than is necessary for the purposes for which the personal information is processed, 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. Further details on this are available in our Data Retention Schedule which you can request from us by contacting our Managing Partner (details below)

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.

8. **YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED**

Your rights in connection with personal information

8.1 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.

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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

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 in writing, by email or telephone using the details shown in paragraph 10 below.

No fee usually required

8.2 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

8.3 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 we take to ensure that personal information is not disclosed to any person who has no right to receive it.

9. YOUR DUTY TO INFORM US OF CHANGES

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.

10. CONTACTS & COMPLAINTS

If you have any questions about how we treat and protect your personal data and your privacy, if you have any comments, wish to seek to exercise any of your rights as outlined above or to complain, please contact our Managing Partner at Chapter House North, Abbey Lawn, Shrewsbury, SY2 5DE, by telephone on 01743 280287 or by email (brian.evans@lblaw.co.uk).

We hope that we can resolve any query or concern you raise about our use of your information. If not, you may contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Schedule

About the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Identity data including first name and last name or similar identifier, title, date of birth.	From you	<p>To enter into/perform our contract with you</p> <p>Legitimate interest: to ensure that you are properly identified as a supplier and that we are able to perform our obligations under our contract with you on an on-going basis</p> <p>Where we need to comply with a legal or regulatory obligation</p>	<p>To enter into/perform our contract with you</p> <p>We may share this information with third parties we use to undertake financial due diligence checks, in the normal course of using our IT systems, to obtain professional advice, to report to HMRC, or regulators if required.</p>
Contact data, including addresses, email addresses and telephone numbers.	<p>From you</p> <p>From publicly available sources such as Companies House and the Electoral Register</p>	<p>To enter into/perform our contract with you</p> <p>Legitimate interest: to ensure that you are properly identified as a supplier and that we are able to perform our obligations under our contract with you on an on-going basis</p> <p>Where we need to comply with a legal or regulatory obligation</p>	<p>To enter into/perform our contract with you</p> <p>We may share this information with third parties we use to undertake financial due diligence checks, in the normal course of using our IT systems, to obtain professional advice, to report to HMRC, or regulators if required.</p>
Financial data including bank account details, billing information, credit history, and information to enable us to undertake financial due diligence on you	<p>From you</p> <p>From selected third parties including credit reference agencies</p>	<p>To enter into/perform our contract with you</p> <p>Legitimate interest: to undertake financial due diligence on you, and to enable us to make payments to you under our contract with you.</p> <p>Where we need to comply with a legal or regulatory obligation</p>	<p>To enter into/perform our contract with you</p> <p>To establish your ability to fulfil your contractual commitments to us</p> <p>To make payments to you</p> <p>We may share this information with third parties we use to undertake financial due diligence checks, in the normal course of using our IT systems, to obtain professional advice, to report to HMRC, or regulators if required.</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Contract and transaction data including details about payments to and from you and other details of products and services you have supplied to us, contact history, purchase history, saved items</p>	<p>From you</p> <p>From our financial ledgers and accounting records</p> <p>From providers of technical payment and delivery services</p>	<p>To enter into/perform our contract with you</p> <p>Legitimate interest: to keep our records up to date</p>	<p>To enter into/perform our contract with you</p> <p>To keep our records up to date</p> <p>For business management and planning</p> <p>We may share this information with third parties we use to undertake financial due diligence checks, in the normal course of using our IT systems, to obtain professional advice, to report to HMRC, or regulators if required.</p>