



## **Privacy Policy**

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of UK data protection laws, the data controller is Manchester Square Partners LLP of 8 Buckingham Place, London, SW1E 6HX.

#### DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal data must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner that ensures appropriate security.

#### INFORMATION YOU GIVE TO US

You may give us information, such as your name, home and work addresses, email address, job title, mobile and home phone numbers, company details, salary, bank details, gender, photographs, transactional information and notes from client meetings by:

- working with us, giving us your business card,
- attending meetings with us,
- engaging with us via social media, or
- corresponding with us by phone, email, linked-in, letters or otherwise.

We may use the information you give to us for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

<b>Purposes for which we will use the information you give to us</b>	<b>Legal basis</b>
To register you as a new client	It will be necessary in order to take steps at your request prior to entering into a contract between you and us, or between us and current or former employer
Where you are acting as a	It will be necessary for our

representative of a company or organisation, then to register that company or organisation as a new client	legitimate business interests, namely to take steps prior to entering into a contract between us and current or former employer
To provide you with the benefit of our services	It will be either be necessary for the performance of the contract between you and us or, where we enter into a contract with your current or former employer, it will be necessary for our legitimate business interests, namely the performance of the contract with your current or former employer
To process your service requirements, including raising invoices, managing payments, fees and charges	It will be either be necessary for the performance of the contract between you and us or, where we have a contract with your current or former employer, it will be necessary for our legitimate business interests, namely the performance of the contract with your current or former employer
To obtain further information about you, any company or organisation you represent, and the matter that is the subject of the professional services we have agreed to provide	It will be either be necessary for the performance of the contract between you and us or, where we have a contract with your current or former employer, it will be necessary for our legitimate business interests, namely the performance of the contract with your current or former employer
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for products that you have ordered from us
To notify you about changes to our standard terms or this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions
To monitor equality and diversity of our organisations	It is necessary for the performance of a task carried on in the public interest, namely identifying and keeping under review the existence or absence of equality of opportunity or treatment of persons

Where it is a legal obligation or a contractual requirement to provide us with certain information, then we will be unable to provide you with the benefit of our services if you fail or refuse to do so.

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

#### ‘SPECIAL CATEGORY’ DATA

Information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as ‘special category’ data.

We may collect, use and store occasional pieces of ‘special category’ data, particularly in relation to the monitoring of equality and diversity of our organisation. Otherwise, we would not ordinarily expect to collect, use and store your ‘special category’ data. If we were to do so, then we would only do so:

- provided we have your explicit consent to use it, or
- we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent, or
- you have previously made that data public knowledge, or
- we need to use that data to establish, exercise or defence legal claims.

#### DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share your personal information with:

- HM Revenue & Customs and the Information Commissioner’s Office
- our auditors and professional advisers;
- Dropbox, Google Drive, Zoho, Xero and other online cloud providers that we use in the course of our business to store our database;
- analytics and search engine providers that assist us in the improvement and optimisation of our website; and
- selected third parties to the extent we reasonably consider that it is in your best interests for us to do so, or it is necessary for our legitimate business interests.

We will disclose your personal information to third parties:

- in the event that we enter into negotiations to sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if Manchester Square Partners or substantially all of its assets are acquired by a third party, in which case personal data held by it about you will be one of the assets transferred to the third party; or
- 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 us, or our website terms of use, or to protect the rights, property, or safety of Manchester Square Partners, our customers, or

others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers in the European Union.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Building entry controls.** The buildings in which your personal information is stored are kept secure by the use of alarm systems, lockable access and monitored entry systems.
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Firewalls and encryption.** We apply industry- standard firewall protection and encryption technology, including two-factor authentication.
- **Overseas transfers.** Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

Some of the data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom. It may also be processed by personnel operating outside the United Kingdom where this is necessary in order for us to perform our services. By submitting your personal data, you agree to this transfer, storing or processing. If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### HOW LONG WE WILL STORE YOUR PERSONAL DATA

The length of time that we will store your data will depend on the ‘legal basis’ for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us, or where it	We will use/store your data for as long as it is necessary for the performance of the

is necessary in order to take steps at your request prior to entering into a contract between you and us	contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data until we no longer have a legitimate interest in using/storing your data
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop
Where we use/store your data because it is necessary for the performance of a task carried on in the public interest, namely identifying and keeping under review the existence or absence of equality of opportunity or treatment of persons	We will use/store your data for as long as it remains legal for us to do so, but for no longer than [2] years. You can ask us to stop using/storing your data for that particular reason. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will be entitled to refuse your request

#### YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the ‘right to be forgotten’). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.

- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact our partnership manager by writing to the address at the top of this policy, or by emailing us at [info@msp.co.uk](mailto:info@msp.co.uk).

You also have the right, at any time, to lodge a complaint with the Information Commissioner’s Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

#### AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

#### CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check our website frequently to see any updates or changes to our policy.

#### CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to our partnership manager by writing to the address at the top of this policy, or by emailing us at [info@msp.co.uk](mailto:info@msp.co.uk).

**Policy Updated: 20<sup>th</sup> February 2020**