

## **PRIVACY NOTICE**

Bond Legal Ltd is committed to protecting your privacy and security. We respect the privacy of every individual whose personal information we process in providing our services, or whose personal information we may process as a result of providing our services to others, or who applies to work with us.

Personal information is any information relating to an identified or identifiable living person. When 'you' or 'your' are used in this statement, we are referring to the relevant individual who is the subject of the personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ. This privacy notice explains how and why we use your personal information, when we may reveal it to others, how we keep it secure and what your rights are in relation to that information.

### Who we are

Bond Legal Limited is a company incorporated and registered in England and Wales (registration number: 11723699) whose registered office is at 19A The Nook, Anstey, Leicester LE7 7AZ.

We provide advice to organisations and individuals relating to employment law and issues relating to human resources.

We are registered with the Information Commissioner's Office, which is the UK regulator for data protection.

The person responsible for data protection issues within Bond Legal Ltd is Simon Bond. If you have any questions about this Privacy Notice or want to exercise your rights as set out in this Privacy Notice, please contact us by sending an email to <u>simon.bond@bondlegal.co.uk</u>.

In some cases we will process data on behalf of organisations that we carry out work for. There may also be cases where we act as the data controller. Whether we are a data processor or a data controller for the purposes of your data will depend on the nature of the arrangements between us and the organisation we are working for and the nature of the services that we are carrying out.

# Employment law and people management experts.

Bond Legal Limited is incorporated and registered in England and Wales, number: **11723699** Registered Office: **19A The Nook, Anstey, Leicester LE7 7AZ** VAT registration number: **349 9841 39** 

# Information we collect, how we use it, and how long we keep it for

We will only collect information about you if we have a lawful reason to do so. Lawful reasons include performing our contract (where you are our client), where we have a 'legitimate interest' (for example, if you are referred to in a matter on which we are advising), and where you have given your permission for us to use your personal information in a particular way (for example, marketing or training updates).

We may collect personal information about you for the following reasons:

# 1. Providing advice and other services

We will use information about our clients to provide advice and other services to them.

This processing of personal information by us is necessary for the purposes of implementing the contract between us and our client by which we have agreed to provide providing professional services to our client. It is also necessary for the client's legitimate interest in receiving the professional services we have agreed to provide to them. Where we process special categories of personal data, we rely on a relevant public interest condition or consent.

We may use information about persons and organisations, who are not our clients, for the purposes of providing advice and services to our clients or for the purposes of marketing as set out below.

We normally keep original papers for seven years after we have finished providing our advice or service, after which we will securely destroy them. If we have any electronic copies of your information, we will keep them for 15 years after we have finished work on the advice or services to which the data relate.

The information that we hold and process about you will depend on the nature of the advice and services that we are providing to our client. The categories of personal data processed by us in relation to the services we provide are numerous and it is not possible to provide an exhaustive list. However, they may include:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- date of birth;
- gender;
- marital status and dependants;
- salary, annual leave, pension and benefits information;
- start date;
- location of employment or workplace;

- recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- employment records (including job titles, work history, working hours, training records and professional memberships);
- compensation history;
- performance information;
- disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipecard records;
- internal communications such as emails, text messages and messages sent via instant messaging systems and applications;
- information about the use of information and communications systems; and
- photographs.

For certain services or activities, we may process special categories of personal data, including information about:

- race or ethnicity, religious beliefs, sexual orientation and political opinions;
- trade union membership;
- health, including any medical condition, health and sickness records; and
- criminal convictions and offences.

# 2. Marketing and legal updates

If you have given us permission to do so, we may send you the following information by mail, email or text message:

- promotional material about us, our services and products;
- updates in the law and HR best practice;
- details of articles, events or training sessions that we feel may be of interest to you.

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services.

We will not share your information for marketing purposes outside Bond Legal Limited.

You can decide not to receive marketing communications or change how we contact you at any time. If you want to do so, please contact <u>info@bondlegal.co.uk</u>. An email to that address with **UNSUBSCRIBE** in the subject line will suffice.

If you ask us to not send you marketing emails, we will continue to hold enough information about you to maintain a record of your preference not to receive emails.

If you have provided us with information by subscribing to our mailing list on our website or by otherwise contacting us through our website, we will use that information to respond to your enquiry and to record and monitor enquiries.

# 3. Recruitment and employment

We will process data about individuals who apply to work with us and with whom we enter into a relationship of employment or self-employment. This processing is necessary for the purposes of:

- the legitimate interests pursued by us to administer, manage and develop our business; and
- the legal obligations we owe to those that we employ or enter into a consultancy agreement.

We may process special categories of personal data, in relation to individuals who work (or apply to work) with us. This includes information about:

- race or ethnicity, religious beliefs, sexual orientation and political opinions;
- trade union membership;
- health, including any medical condition, health and sickness records; and
- criminal convictions and offences.

We will hold any information you have provided on a recruitment application form for recruitment purposes only. We will not pass that information to anyone else without your consent. If your application is unsuccessful, we will hold the information you give us for 12 months, after which time we will delete it.

# 4. Administration

We also use the information you give us for related purposes, such as:

- meeting legal and regulatory obligations;
- keeping records;
- statistical analysis;
- equal opportunities monitoring;
- analysing operational and financial systems; and
- training and quality control.
- managing our relationship with clients and prospective clients;
- developing our business and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events; and

• administering and managing our website and systems and applications.

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services.

# **Confidentiality and Security**

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

All of our employees, workers, consultants and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with, the processing of personal information, are obliged to respect the confidentiality of the personal information of all individuals whose personal information we process in the course of providing our services.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats.

Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures.

This processing is necessary for the purposes of the legitimate interests pursued by us to ensure network and information security, manage risks to our business and check the quality of our services.

## Website

Our web sites <u>www.bondlegal.co.uk</u> and <u>www.bondlegal.com</u> are owned and controlled by Bond Legal Ltd.

We respect the privacy of all those who visit our websites and use our online services. We collect information from and about our website users in order to improve the services we offer. Except as set out within this Privacy Notice, we do not release personally identifiable information about users of our websites without their permission. This processing is necessary for the purposes of the legitimate interests pursued by us to promote our business and services.

# Who has access to your information

### Our client

The nature of our work means that we may need to share your information with our clients if we collect it during the course us of providing advice and services to our clients

If we are working with you and another person or organisation on the same matter, or with you on behalf of another person or organisation, we may share information you give us with the other parties involved in the matter.

### Third-party experts and suppliers

When providing our services, we may need to share your information with:

- other professional advisers, such as:
  - barristers or other experts, who we may instruct to advise on our clients' behalf or who are representing the other side in a case or transaction;
  - o financial and tax advisers, who we may instruct to advise our client;
  - insurers, where the product or service we providing to our client is covered by a policy of insurance;
  - other advisers, for example solicitors who may be acting for another related party in a case or transaction on which we are advising.
- a Court or Tribunal in matters relating to legal action; or
- companies or people who carry out typing, photocopying, archiving or who provide other services or administrative support. All of our suppliers have entered into contracts with us that include terms which protect the information that they hold or process on our behalf.

## Regulatory purposes and outsourcing

We may also need to reveal information about you in other situations to other people, such as:

- our auditors and other professional organisations for audit, quality-control and other purposes;
- our insurers, whether or not you have made a claim against us;
- our legal advisers; and
- regulatory or tax authorities.

Like many businesses, we also outsource some of our computer systems to specialist providers. All of our specialist providers have entered into contracts with us that include terms which protect the information that they hold or process on our behalf.

# **Cross-border transfers**

In the normal course of doing business, we will not transfer any of your information outside of the EEA. However, if we do need to share your data with people or organisations in other countries, we will make sure that appropriate protection is in place to transfer your information securely.

### Cookies and online analysis

Cookies are small text files that websites put on your computer so the site can remember who you are. They contain a unique, anonymous identifier, which is usually a string of letters or numbers.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website, and also allows us to improve our site.

We use analytical cookies in the form of Google Analytics and Google Tag Manager. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by making sure that users are finding what they are looking for easily.

For more information, please view the Google Analytics cookie information page.

These non-essential cookies do not identify any person and are used only to track how our website is used.

You can find more information about allowing and disabling cookies at <u>www.allaboutcookies.org</u>.

### How to access your information and your other rights

If we are the data controller in respect of your personal information, you have the following rights in relation to the personal information we hold about you. Please note that these rights are subject to certain exemptions which may be applicable to any request you make.

## Your right of access

If you ask us, we will confirm whether or not we are processing your personal information and, subject to any applicable exemptions, provide you with a copy of that personal information (along with certain other details) within the applicable timescales.

Alternatively, where applicable, we will provide you with an explanation as to why we will not be complying with your request.

If you require additional copies of any data, we may need to charge a reasonable fee.

## Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we will let them know about the rectification, where possible and where this would not involve disproportionate effort.

If you ask us we will, where possible and lawful to do so, also tell you who we have shared your personal information with so that you can contact them directly.

### Your right to erasure

You can ask us to delete or remove your personal information in some circumstances, such as where we no longer need it or, where applicable, you withdraw your consent If you are entitled to erasure and if we have shared your personal information with others, we will take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

### Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us processing your personal information.

If you are entitled to restriction and if we have shared your personal information with others, we will let them know about the restriction where it is possible for us to do so. If you ask us we will, where it is possible and lawful for us to do so, tell you who we have shared your personal information with so that you can contact them directly.

## Your right to data portability

You have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

### Your right to object

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing.

## Your rights in relation to automated decision-making and profiling

You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

### Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

If you want to exercise any of these rights you can do so by contacting Simon Bond at <u>simon.bond@bondlegal.co.uk</u>.

### Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal information, you can report it to the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <u>https://ico.org.uk/concerns</u> or by calling their office on 0303 123 1113.

### Changes to this privacy notice

We will amend this privacy notice from time to time to make sure it is up to date and accurately reflects how and why we use your personal information. The current version of our privacy notice will always be posted on our website.