**(A) This Policy**

This Policy explains how we may Process your Personal Data. This Policy may be amended or updated from time to time, so please check it regularly for updates.

This Policy is issued by Meysan Partners UK LLP a limited liability partnerships registered in England and Wales under number OC446496 with a registered office at Berkeley Square House, Berkeley Square, London, United Kingdom, W1J 6BD (“Meysan”, “we”, or “us”).

This Policy is addressed to individuals outside our organization with whom we interact, including individual clients, representatives of client organizations, visitors to our Sites, users of our Apps, and other users of our services (together, “you”). Defined terms used in this Policy are explained in Section (R) below.

For the purposes of this Policy, Meysan is the controller. Contact details for any enquiries or other correspondence relating to this Policy are provided in Section (Q) below.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make to the terms of this Policy.

**(B) Collection of Personal Data**

We may collect or obtain Personal Data about you: (i) directly from you (e.g., where you contact us); (ii) in the course of our relationship with you (e.g., if we provide legal advice to you); (iii) when you make your Personal Data public (e.g., if you make a public post on social media); (iv) when you download, install, or use any of our Apps; (v) when you visit our Sites; (vi) when you register to use any of our services; or (vii) when you interact with any third party content or advertising on a Site or in an App. We may also receive Personal Data about you from third parties (e.g., law enforcement authorities).

We may collect Personal Data about you from the following sources:

**Data you provide:** We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means, or if you provide us with your business card).

**Relationship data**: We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g., in the course of corresponding with you).

**Data you make public:** We may collect or obtain your Personal Data that you choose to make public, including via social media (e.g., we may collect information from your social media profile(s), if you make a public post).

**App data:** We may collect or obtain your Personal Data when you download or use any of our Apps.

**Site data:** We may collect or obtain your Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.

**Registration details:** We may collect or obtain your Personal Data when you use, or register to use, any of our Sites, Apps, or services.

**Content and advertising information:** If you choose to interact with any third-party content or advertising on a Site or in an App, we may receive Personal Data about you from the relevant third party.

**Third party information:** We may collect or obtain your Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).

**(C) Creation of Personal Data**

We may create Personal Data about you (e.g., records of your interactions with us).

We may also create Personal Data about you, such as records of your communications and interactions with us, including attendance at events we hold or interviews in the course of applying for a job with us. We may record telephone calls, meetings, depositions, and other interactions in which you are involved, in accordance with applicable law.

**(D) Categories of Personal Data we may Process**

We may Process: (i) your personal details (e.g., your name); (ii) demographic data (e.g., your age); (iii) your contact details (e.g., your address); (iv) matter details (e.g., your instructions to us); (v) records of your consents to our Processing of your Personal Data; (vi) payment details (e.g., your billing address); (vii) information about your use of our Sites and Apps (e.g., the type of device you are using); (viii) details of your current employer; (ix) information about your interactions with our content or advertising; and (x) any views or opinions you provide to us.

We may Process the following categories of Personal Data about you:

**Personal details:** given name(s); preferred name; and photograph.

**Demographic information:** gender; date of birth / age; nationality; salutation; title; and language preferences.

**Identifier information:** passport or national identity number; utility provider details; bank statements; tenancy agreements.

**Contact details:** correspondence address; telephone number; email address; and details of your public social media profile(s).

**Matter details:** details of individuals instructing Meysan; Personal Data included in correspondence, transaction documents, evidence or other materials that we Process in the course of providing services and legal advice.

**Attendance records:** details of meetings and other events organized by or on behalf of Meysan that you have attended.

**Consent records:** records of any consent you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).

**Payment details:** billing address; payment method; bank account number or credit card number; cardholder or accountholder name; card or account security details; card ‘valid from’ date; and card expiry date; invoice records; payment records; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques.

**Data relating to our Sites and Apps:** device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; App usage statistics; App settings; dates and times of connecting to an App; and other technical communications information; username; password; security login details; usage data; aggregate statistical information.

**Employer details:** where you interact with us in your capacity as an employee, the name, address, telephone number and email address of your employer, to the extent relevant.

**Content and advertising data:** records of your interactions with our online advertising and content, records of advertising and content displayed on pages or App screens displayed to you, and any interaction you may have had with such content or advertising (including mouse hover, mouse clicks, any forms you complete (including incomplete forms not submitted) and any touchscreen interactions).

**Views and opinions:** any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

**(E) Sensitive Personal Data**

Where we need to Process your Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

We may have to Process your Sensitive Personal Data in the ordinary course of our business. Where it becomes necessary to process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

**Compliance with applicable law:** We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);

**Detection and prevention of crime:** We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime (including the prevention of fraud);

**Establishment, exercise, or defense of legal rights:** We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise, or defense of legal rights; or

**Consent:** We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your express consent prior to Processing your Sensitive Personal Data (this legal basis is not used in relation to Processing that we are legally required to carry out).

**(F) Purposes of Processing and legal bases for Processing**

We Process Personal Data for the following purposes: providing our Sites, Apps, and services to you; compliance checks; operating our business; communicating with you; managing our IT systems; health and safety; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; compliance with applicable law; improving our Sites, Apps, and services; fraud prevention; and recruitment and dealing with job applications.

The purposes for which we Process Personal Data, subject to applicable law, and the legal bases on which we perform such Processing, are as follows:

|  |  |
| --- | --- |
| Processing Activity | Legal basis for Processing |
| * Provision of Sites, Apps, and services: providing our Sites, Apps, or services, including legal and notarial advice; providing promotional items and information upon request; and communicating with you in relation to those Sites, Apps, or services.
 | * The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
* We have a legitimate interest in carrying out the Processing for the purpose of providing our Sites, Apps, and services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory).
 |
| * Compliance checks: fulfilling our regulatory and notarial compliance obligations; ‘Know Your Client’ checks; and confirming and verifying your identity; use of credit reference agencies; and screening against government and/or law enforcement agency sanctions lists and other legal restrictions.
 | * The Processing is necessary for compliance with a legal obligation; or
* The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
* We have a legitimate interest in carrying out the Processing for the purpose of fulfilling our regulatory and compliance obligations (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory).
 |
| * Operating our business: operating and managing our Sites, our Apps, and our services; providing content to you; displaying advertising and other information to you; communicating and interacting with you via our Sites, our Apps, or our services; and notifying you of changes to any of our Sites, our Apps, or our services.
 | * The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
* We have a legitimate interest in carrying out the Processing for the purpose of providing our Sites, our Apps, or our services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is not used in relation to Processing that we are legally obliged or which we otherwise need to carry out).
 |
| * Communications and marketing: communicating with you *via* any means (including *via* email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject always to obtaining your prior opt-in consent to the extent required under applicable law; maintaining and updating your contact information where appropriate; obtaining your prior, opt-in consent where required; and recording telephone calls, meetings, depositions, and other interactions in which you are involved, in accordance with applicable law.
 | * The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
* We have a legitimate interest in carrying out the Processing for the purpose of contacting you, subject always to compliance with applicable law (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is not used in relation to Processing that we are legally obliged to carry out).
 |
| * Management of IT systems: management and operation of our communications, IT and security systems; and audits (including security audits) and monitoring of such systems.
 | * The Processing is necessary for compliance with a legal obligation; or
* We have a legitimate interest in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
 |
| * Health and safety: health and safety assessments and record keeping; providing a safe and secure environment at our premises; and compliance with related legal obligations.
 | * The Processing is necessary for compliance with a legal obligation; or
* We have a legitimate interest in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* The Processing is necessary to protect the vital interests of any individual.
 |
| * Financial management: sales; finance; corporate audit; and vendor management.
 | * We have a legitimate interest in carrying out the Processing for the purpose of managing and operating the financial affairs of our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is not used in relation to Processing that we are legally obliged to carry out).
 |
| * Surveys: engaging with you for the purposes of obtaining your views on our Sites, our Apps, or our services.
 | * We have a legitimate interest in carrying out the Processing for the purpose of conducting surveys, satisfaction reports and market research (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is not used in relation to Processing that we are legally obliged or otherwise need to carry out).
 |
| * Security: physical security of our premises (including records of visits to our premises); CCTV recordings; and electronic security (including login records and access details).
 | * The Processing is necessary for compliance with a legal obligation; or
* We have a legitimate interest in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business and our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
 |
| * Investigations: gathering, analyzing and collating evidence and materials; creating and maintaining recordings of telephone calls, meetings, depositions, and other interactions, in accordance with applicable law; and detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.
 | * The Processing is necessary for compliance with a legal obligation; or
* We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
 |
| * Legal proceedings: establishing, exercising and defending legal rights.
 | * The Processing is necessary for compliance with a legal obligation; or
* We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
 |
| * Legal compliance: compliance with all our legal and regulatory obligations under applicable law (including those applying to providers of notarial services).
 | * The Processing is necessary for compliance with a legal obligation.
 |
| * Improving our Sites, Apps, and services: identifying issues with our Sites, our Apps, or our services; planning improvements to our Sites, our Apps, or our services; and creating new Sites, Apps, or services.
 | * We have a legitimate interest in carrying out the Processing for the purpose of improving our Sites, our Apps, or our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is not used in relation to Processing that we are legally obliged or otherwise need to carry out).
 |
| * Fraud prevention: Detecting, preventing, and investigating fraud.
 | * The Processing is necessary for compliance with a legal obligation (especially in respect of applicable employment law); or
* We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
 |
| * Recruitment and job applications: recruitment activities; advertising of positions; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details.
 | * The Processing is necessary for compliance with a legal obligation (especially in respect of applicable employment law); or
* We have a legitimate interest in carrying out the Processing for the purpose of recruitment activities and handling job applications (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
* We have obtained your prior consent to the Processing (this legal basis is not used in relation to Processing that we are legally obliged or otherwise need to carry out).
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**(G) Disclosure of Personal Data to third parties**

We may disclose your Personal Data to: (i) legal and regulatory authorities; (ii) our external advisors; (iii) our Processors; (iv) any party as needed in connection with legal proceedings; (v) any party necessary for investigating, detecting or preventing criminal offences; (vi) any purchaser of our business; and (vii) any third-party providers of advertising, plugins or content used on our Sites or our Apps.

We may disclose your Personal Data to other Meysan entities, for legitimate business purposes (including operating our Sites and our Apps, and providing services to you), in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality and professional secrecy. In addition, we may disclose your Personal Data to:

legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;

accountants, auditors, lawyers and other outside professional advisors to Meysan, subject to binding contractual obligations of confidentiality;

third party Processors (such as providers of data hosting services and document review services), located anywhere in the world, subject to the requirements noted below in this Section (G);

any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defiance of legal rights;

any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security.

any relevant third-party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and

any relevant third-party provider, where our Sites and our Apps use third party advertising, plugins or content. If you choose to interact with any such advertising, plugins or content, your Personal Data may be shared with the relevant third-party provider. We recommend that you review that third party’s privacy policy before interacting with its advertising, plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data, together with any additional requirements under applicable law.

**(H) International transfer of Personal Data**

We may transfer your Personal Data to recipients in other countries. Where we transfer Personal Data from the EEA or the UK to a recipient outside the EEA or the UK that is not in an Adequate Jurisdiction, we do so on the basis of Standard Contractual Clauses.

Because of the international nature of our business, we may need to transfer your Personal Data to other Meysan entities, and to other third parties as noted in Section (G) above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Where we transfer your Personal Data from the EEA or the UK to recipients located outside the EEA or the UK who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section (P) below.

Please note that when you transfer any Personal Data directly to a Meysan entity established outside the EEA, we are not responsible for that transfer of your Personal Data (and such transfer is not based on or protected by our Standard Contractual Clauses). We will nevertheless Process your Personal Data, from the point at which we receive those data, in accordance with the provisions of this Privacy Policy.

**(I) Data security**

We implement appropriate technical and organizational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your personal data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

**(J) Data accuracy**

We take every reasonable step to ensure that your Personal Data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that:

your Personal Data that we Process are accurate and, where necessary, kept up to date; and

any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

**(K) Data minimization**

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Policy.

**(L) Data retention**

We take every reasonable step to ensure that your Personal Data are only retained for as long as it is needed.

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Policy.

The criteria for determining the duration for which we will keep your Personal Data are as follows: we will retain copies of your Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. In particular, we may retain your Personal Data for the duration of any period necessary to establish, exercise or defend any legal rights.

**(M) Your legal rights**

Under applicable law, you may have a number of rights, including: (i) the right not to provide your Personal Data to us; (ii) the right of access to your Personal Data; (iii) the right to request rectification of inaccuracies; (iv) the right to request the erasure, or restriction of Processing, of your Personal Data; (v) the right to object to the Processing of your Personal Data; (vi) the right to have your Personal Data transferred to another Controller; (vii) the right to withdraw consent; (viii) and the right to lodge complaints with Data Protection Authorities. We may require proof of your identity before we can give effect to these rights.

Subject to applicable law, you may have a number of rights regarding our Processing of your Relevant Personal Data, including:

the right not to provide your Personal Data to us (however, please note that we may be unable to provide you with the full benefit of our Sites, our Apps, or our services, if you do not provide us with your Personal Data);

the right to request access to, or copies of, your Personal Data, together with information regarding the nature, Processing and disclosure of those Personal Data;

the right to request rectification of any inaccuracies in your Personal Data;

the right to request, on legitimate grounds:

erasure of your Personal Data; or

restriction of Processing of your Personal Data;

the right to have certain Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;

where we Process your Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and

the right to lodge complaints with a Data Protection Authority regarding the Processing of your Personal Data by us or on our behalf.

Subject to applicable law, you may also have the following additional rights regarding the Processing of your Relevant Personal Data:

the right to object, on grounds relating to your particular situation, to the Processing of your Relevant Personal Data by us or on our behalf; and

the right to object to the Processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes.

Nothing in this Policy affects any of your other statutory rights.

To exercise one or more of the rights described in this Policy, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section (Q) below. Please note that:

we may require proof of your identity before we can give effect to these rights; and

where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

**(N) Cookies and similar technologies**

We may Process your Personal Data by our use of Cookies and similar technologies.

When you visit a Site or use an App we may place Cookies onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through Cookies and similar technologies, in accordance with our **Cookie Policy.**

**(O) Legal Statements**

All use of our Sites, our Apps, or our services is subject to our Legal Statements which is available on this website. We recommend that you review our Legal Statements regularly, in order to review any changes we might make from time to time.

**(P) Direct marketing**

We may Process your Personal Data to contact you with information regarding services that may be of interest to you. You may unsubscribe for free at any time.

We may Process your Personal Data to contact you via email, telephone, direct mail or other communication formats to provide you with information regarding services that may be of interest to you. If we provide services to you, we may send information to you regarding our services and other information that may be of interest to you, using the contact details that you have provided to us and always in compliance with applicable law.

You may unsubscribe from our promotional email list at any time by simply clicking on the unsubscribe link included in every promotional email we send. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested.

**(Q) Contact details**

If you have any comments, questions or concerns about data privacy, including the processing of personal data carried out by us, or on our behalf, please email us at compliance@meysan.com

**(R) Definitions**

"Adequate Jurisdiction" a jurisdiction that has been formally designated by the European Commission or the United Kingdom Government as providing an adequate level of protection for Personal Data.

"App" means any application made available by us (including where we make such applications available via third party stores or marketplaces, or by any other means).

"Controller" means the entity that decides how and why Personal Data are Processed.

"Cookie" means a small file that is placed on your device when you visit a website (including our Sites). In this Policy, a reference to a "Cookie" includes analogous technologies such as web beacons and clear GIFs.

"Data Protection Authority" means an independent public authority that is tasked, by law, with overseeing compliance with applicable data protection laws.

"EEA" means the European Economic Area (the Member States of the European Union, together with Norway, Liechtenstein and Iceland).

"Personal Data" means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

"Process", "Processing" or "Processed" means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Processor" means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

"Sensitive Personal Data" means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.

"Site" means any website operated, or maintained, by us or on our behalf.

"Standard Contractual Clauses" means template data transfer clauses approved by the European Commission or by a Data Protection Authority for the purpose of transferring data outside of the EEA or the United Kingdom.