

## WELCOME TO THE BUTLER SHERBORN'S PRIVACY NOTICE (JANUARY 2021)

Our full details are:	Butler Sherborn LLP, a Limited Liability Partnership, 43-45 Castle Street, Cirencester, Gloucestershire GL7 1GD
Full name of legal entity:	Butler Sherborn LLP, Registered in England and Wales under No. OC419932 ("Butler Sherborn")
Name and email address of data privacy manager:	Jenny Regan jennyregan@butlersherborn.co.uk

Butler Sherborn respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, whether you visit our website (regardless of where you visit it from) or deal with us in person, and tell you about your privacy rights and how the law protects you.

### 1. Important information

This privacy notice aims to give you information on how Butler Sherborn collects and processes your personal data, including any data you may provide through this website or in person.

Our website is not intended for children and we do not knowingly collect data relating to children, our services are provided only to adults.

We may amend this privacy policy from time to time.

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.

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

We have appointed a data privacy manager at Butler Sherborn, who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise, please contact the data privacy manager whose details are as follows: jennyregan@butlersherborn.co.uk.

If you have any query or complaint, we would appreciate the chance to deal with your concerns and ask you to please contact us in the first instance. If we are unable to deal with issue, 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](http://www.ico.org.uk)).

This 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 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Contact Details** includes current address, previous or future address, email address and telephone numbers.

- **Financial Details** includes first name and last name, user name or other identities, marital status, title, date of birth and gender, bank account and payment card details as well as tax details.
- **HR Details** includes annual leave, sick leave and performance related information, qualifications, employment history, ethnicity, disability, potentially health information and/or T.U membership and pension details.
- **Transaction Data** includes details about the properties involved in the transaction payments to and from you and other details of products and services you have requested from us.
- **Technical Data** includes [internet protocol (IP) address, 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 this website].

We do not generally collect any **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), however in relation to employee records, there may be some inclusion of information which is “special category personal data”, which we are entitled to hold under employment law. Nor do we collect any information about criminal convictions and offences.

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

PLEASE SEE THE TABLE below for more detailed information relating to our management of data.

### 3. **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.

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

*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.