



# Privacy Policy Notice

IBSL Group Ltd is committed to protecting and respecting your privacy. We take your privacy very seriously and it is important to us that you can provide personal data to us and enjoy our website without having to compromise your privacy in any way.

This privacy notice sets out the basis on which any personal data we collect from you or others, 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. Please do not send us any of your information if you do not want it to be used in the ways described in this notice.

## Important information and who we are

IBSL Group Ltd is the controller and responsible for your personal data (collectively referred to as “IBSL”, “we”, “us” or “our” in this privacy notice). IBSL is a limited liability company (02416201) whose registered office is at Unit 14D, Double Row, Delaval Trading Estate, Seaton Delaval, Northumberland, NE25 0QT.

We have appointed a data protection officer 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 your legal rights, please contact us using the details set out below.

## Contact details

Name: Steven Renney

Email address: [Steve@ibslgroup.co.uk](mailto:Steve@ibslgroup.co.uk)

Postal address: Unit 14D, Double Row, Delaval Trading Estate, Seaton Delaval, Northumberland, NE25 0QT.

Telephone number: 0191 237 0444

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)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 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.



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## Third-party links

Our website <http://www.ibslgroup.co.uk> 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.

## Information we collect about you

We will need to collect certain personal information in order to provide our service to you. The information collected may include:

- name, address, telephone number and email address;
- Identification documentation eg your passport, driving licence, utility bills and bank statements;
- Financial details including bank, tax details and pension arrangements;
- Job title;
- Details of your education and employment;
- Images captured by our office CCTV cameras;
- Information you provide to us for the purposes of attending meetings and events, including dietary requirements;
- Technical Data including internet protocol (IP) address, your login data, 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 our website.

## Sensitive Personal Data

It may benefit you to notify us of any health condition or disability you have so that we are aware of these conditions and how they affect you. This will allow us to take any reasonable steps to accommodate specific needs or requirements you have when providing our services to you. This type of information is known under the law as ‘special category information’. We may also obtain this type of data from you or third parties in order to provide our legal services to you. We will only process this type of data where it is necessary to exercise, establish or defend a legal claim or with your explicit consent.

## If you fail to provide personal data

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, providing credit facilities). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

## Telephone Calls

We reserve the right to monitor and/or record telephone calls subject to and in accordance with law. All recordings belong to us and any records so kept shall be conclusive proof of instructions given or alleged to have been given



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in the event of a dispute. Any information or any such recordings are subject to disclosure under the data protection legislation. Recordings are retained on the same basis as other personal information pursuant to this notice. Where required or permitted by law, we may use or disclose personal information contained in recordings. We do not use information contained in recordings for marketing purposes. Access to such recordings is restricted to particular individuals within IBSL who have obligations of confidentiality to IBSL.

### How is your personal data collected?

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your details directly by corresponding with us via our website, by post, phone, email or otherwise. This includes personal data you provide when you:

- Instruct a service or purchase.
- Provide personal information into the company website.
- Book and/or pay for the events that we provide.
- Provide us with information in relation to your attendance at any of our seminars or other hosted events.
- Complete any “contact us” forms or claim forms.
- Request marketing to be sent to you.
- Give us some feedback.
- Contact IBSL for any other purpose (including via social media).

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

- Technical Data from analytics providers such as Google.
- Publicly available sources such as Companies House, HM Land Registry, Electoral Register and other search information providers.
- Direct from a third party eg a client, other parties involved in the legal proceedings, a court order or client due diligence providers.
- A third party including your bank or other financial advisor, recruitment agency, your insurer, employer, doctor or other medical professionals.

### How will we use the information we collect?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.



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- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have given consent.

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending upon the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying upon to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing
To provide products & services to you (including dealing with any preliminary enquiries that do not lead to an engagement with us)	(a) Performance of a contract with you or to take steps at your request before entering into a contract (b) Necessary for our legitimate interests (eg to recover debts owed) (c) Consent where we obtain special categories of data (see above) (d) To comply with our legal obligations
To conduct checks to verify identity of our clients	(a) To comply with our legal obligations (b) Necessary for our legitimate interests
Disclosure to auditors, legal and other professional advisers, insurers, insurance brokers and regulatory bodies	(a) To comply with our legal obligations (b) Necessary for our legitimate interests
To make suggestions and recommendations to you about services and events that may be of interest to you and provide you with product updates and briefings	(a) Necessary for our legitimate interests (to develop our services and grow our business) (b) Consent (if applicable)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)



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## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## How long do we keep your data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see 'right to erasure' below for further information.

## Who we share your information with?

We may have to share your personal data with the parties set out below:

- Service providers and agents who process data on our behalf eg IT/internet service and platform providers, archivers, storage facilitators, data room providers and those organisations we engage to help us send marketing communications to you (eg Mailchimp).
- Companies House.
- Our professional advisers, auditors and insurers.
- Our bank.
- HM Revenue & Customs, courts, tribunals, government agencies, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Credit reference agencies.
- 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 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.



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We reserve the right to pass any or all of your personal information to the police or any other law enforcement agency or regulatory body to comply with our legal and regulatory obligations and for the purposes of crime protection or prevention.

We may use social media sites such as Facebook, LinkedIn and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal information

## International Transfers

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Area (EEA). Where this is necessary we will put in place appropriate protection to make sure your personal data remains adequately protected.

## How do we protect your personal data?

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.

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.

If we have given you a username and password which allows you to access certain parts of your matter via our systems, such as a data room, you are responsible for keeping such details confidential.

## Marketing

We may use your information to send you updates about our developments that might be of interest to you and information about our legal services and events. We will get your express opt-in consent before we share your personal data with any other organisation for marketing purposes.



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Please email us to opt-out.

## Your Rights

Under data protection legislation, you have several rights regarding the use of your personal data, as follows:

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



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## 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 will endeavour 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.

## Data protection for Employment and Recruitment Procedures

Details of how we process data for recruitment or employment procedures are covered separately and will be provided to applicants/employees as part of the HR process.

## How to complain about the use of your data

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights outlined above, you can contact us on the details at the start of this notice and we will investigate the matter for you.

If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Supervisory Authority – Information Commissioner’s Office (ICO), Wycliffe House, Water Lane, Wimslow, Cheshire, SK9 5AF. You can find further information about the ICO and their complaints procedure here: <https://ico.org.uk/concerns/>

*This notice was last updated on 25/05/2018. We may change this notice by updating this page to reflect changes in the law or our privacy practices. The most up to date version of the notice can be viewed on our website [www.ibslgroup.co.uk](http://www.ibslgroup.co.uk)*



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