

Privacy Policy

ABOUT US

Stephen George + Partners ("We") are committed to protecting and respecting your privacy. For the purposes of the relevant data protection legislation, the "controller" (or "data controller") Justine Chamberlain, Stephen George + Partners, Waterfront House, 2a Smith Way, Grove Park, Enderby, Leicester, LE19 1SX. We can be contacted at gdp@stephengeorge.co.uk or 0116 2470557.

This Privacy Policy aims to give you information on how Stephen George + Partners collects and processes your personal data through your use of this website, including any data you may provide when you sign up to our blog or newsletter.

TYPES OF PERSONAL DATA WE COLLECT

We may collect, use, store and transfer different kinds of personal data about you, as follows:

- Name, email address and any additional information that you may enter into the comments box

We do not collect any special categories of personal data or personal data relating to children.

The minimum information that we need from you so that you can contact or subscribe to Stephen George + Partners' blog and/or newsletter is your name and email address.

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.

WHY DO WE COLLECT INFORMATION

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, and on the following lawful bases:

- Where we need to perform the contract we are about to enter into or have entered into with you we will need to process.
- 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 we need to contact you in response to a request or query you have submitted on the website.

We also use your personal data in the following ways:

- Name, address and email address in order to send marketing material and/ newsletters if you have requested or opted in to receive such documentation. Data is stored on Stephen George + Partners document management system until it has been requested to be removed.

WHEN DO WE COLLECT INFORMATION

You may give us your name, address and email by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you subscribe to our newsletter or blog.

Stephen George + Partners do not collect any data received via cookies. The cookie policy can be reviewed at by clicking this link <http://www.stephengeorge.co.uk/cookie-policy/>.

WHEN WILL WE SHARE YOUR PERSONAL DATA?

We shall not share your personal data with any third parties for marketing purposes without your express consent. We shall however, share your personal data with third parties for the following reasons:

- To fulfil contract/for the purposes of data security.
- If transfer data outside of EEA, state safeguards in place to enable lawful transfer.

We reserve the right to disclose or share your personal data in order to comply with any legal requirements, enforce our terms and conditions, or any other agreement we enter into with you, or to protect the rights, property, or safety of our business and other customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WILL WE STORE YOUR PERSONAL DATA?

All personal data that you provide to us is stored on Stephen George + Partners document management system. 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.

HOW LONG WILL WE KEEP HOLD OF YOUR PERSONAL DATA

How long we store your personal information depends upon the type of information we are holding and the purpose for which we need it, [and in accordance with our Data Retention Policy from time to time, which is available on request].

We shall keep your data for the period of time you hold an account with us, to enable us to contact you, keep a record of your past orders and supply you with any new orders. We shall not keep your personal information for any longer than necessary to fulfil our obligations to you or to meet our legitimate business interests or legal requirements.

Where you have given us your permission to contact you for marketing purposes, we shall contact you once a year from the date on which you originally gave your permission to ensure that you still wish to be contacted in this way.

YOUR RIGHTS

Under certain circumstances, you have the following rights:

- to request that we provide you with a copy of the information we hold about you (“Access Request”);
- to request that we rectify any information we hold about you (“Right to Rectification”);
- to request that we erase any information we hold about you (“Right to be Forgotten”);
- to restrict the level of processing we carry out with your information (“Restriction of Processing”);
- to obtain from us all personal data we hold about you in a structured, machine readable form, and have this information transmitted to another organisation (“Data Portability”);
- to object to our processing your information in certain ways (“Right to Object”); and
- to withdraw your consent at any time to our processing of your data.

Please see the relevant sections below for further details on your rights as a data subject. You can exercise any of the above rights by emailing us at gdpr@stephengeorge.co.uk. You also have the right to lodge a complaint with the Information Commissioners Office if you are unhappy in any way with how we treat your personal information.

We shall comply with any request made under this section as soon as possible, and normally within one month from the date of your request. However, if necessary, for example if your request is particularly complex or we receive a number of similar requests, we may extend this period by an additional two months, but we shall notify you if we need to do this.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). Please note that where we receive requests under this section which are manifestly unfounded or excessive, for example because they are repetitive in nature, we may charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested or refuse to act on the request.

ACCESS REQUEST

You have the right to request a copy of the information that we hold about you at any time. Please note that in most circumstances, we shall not make a charge for this, however we may make a reasonable fee based on administrative costs for any further copies requested. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

RIGHT TO RECTIFICATION

You have the right at any time to ask us to rectify any personal data that we hold for you which is incorrect or incomplete. 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.

If we have disclosed any incorrect or incomplete data to any third parties, we shall inform them of any necessary amendments or corrections made to your personal data under this section.

RIGHT TO BE FORGOTTEN

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.

RESTRICTION OF PROCESSING

You can ask us to restrict how we use your data in the following circumstances:

- where you believe that the information we hold about you is inaccurate, you can ask that we refrain from using your data until we can verify the accuracy of it;
- where we have unlawfully processed your data, you can ask that we restrict our usage of it rather than erase it completely; or
- where we no longer need to hold your information, but you wish us to retain your information for the purpose of establishing, exercising or defending a legal claim.

DATA PORTABILITY

You have the right to obtain from us all personal data which you have provided to us in a structured, commonly used and machine readable form, provided that such data was processed based on your consent, or for the purpose of a contract between us and the processing was carried out by automated means. 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.

RIGHT TO OBJECT

You have the right to object, on grounds relating to your particular situation, to our processing of your personal data where we are doing this for the performance of a task carried out in the public interest (which we shall have told you about, if applicable), or where we are carrying out processing for the purposes of legitimate interests pursued by us.

You also have the right at any time to ask us not to process your personal data for direct marketing or profiling purposes (to the extent that such profiling is related to such direct marketing). We shall have informed you before the time we obtained your personal data whether we intend to process your personal data for this purpose, or if we intend to disclose your information to any third party for such purposes.

If we process your personal data for automatic decision making or profiling purposes (i.e. to analyse or predict your personal preferences and purchase behaviour, and such profiling is automated) we shall ensure that we tell you about this beforehand, and will only do this where this is a necessary condition of entering into a contract between you and us, or where you have given us your explicit consent to do this.

RIGHT TO WITHDRAW CONSENT

Where you have given us your consent to our processing of any of your personal data, you have the right to withdraw your consent at any time, for example if you no longer wish for us to share your information with third parties for marketing purposes (where you have previously consented to this). 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.

THIRD PARTY WEBSITES

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.

SUBJECT RIGHTS

Under certain circumstances, an individual has the following rights:

1. to request that we provide the individual with a copy of the personal data that we hold about him or her ("Access Request");
2. to request that we rectify any personal data that we hold about an individual ("Right to Rectification");
3. to request that we erase any personal data that we hold about an individual ("Right to be Forgotten");
4. to restrict the level of processing we carry out with an individual's personal data ("Restriction of Processing");
5. to obtain from us all personal data that we hold about an individual in a structured, machine readable form, and have this information transmitted to another organisation ("Data Portability");
6. to object to our processing personal data in certain ways ("Right to Object"); and
7. to withdraw consent at any time to our processing of his or her personal data.

Please see the relevant sections below for further details on an individual's rights as a data subject.

Any of these rights may be exercised by emailing us at gdpr@stephengeorge.co.uk. An individual also has the right to lodge a complaint with the Information Commissioner's Office if unhappy in any way with how we have treated his or her personal information. We would, however, appreciate the opportunity to deal with an individual's concerns before a complaint is made to the Information Commissioner's Office, and would therefore ask individuals please to contact us in the first instance.

We shall comply with any request made under this section as soon as possible, and normally within one month from the date on which the request is received. However, if necessary, for example if the request is particularly complex or we receive a number of similar requests, we may extend this period by an additional two months, but we shall notify the individuals who have made if we need to do this.

Individuals will not usually have to pay a fee to access personal data (or to exercise any of their other rights). However, please note that where we receive requests under this section which are manifestly unfounded or excessive, for example because they are repetitive in nature, we may:

1. charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
2. refuse to act on the request.

We may need to request specific information from an individual to help us confirm an individual's identity and verify his or her right to access their personal data (or to exercise any 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 an individual to ask for further information in relation to the individual's request in order to speed up our response.

Access Request

An individual has the right to request a copy of the information that we hold about him or her at any time. This enables the individual to receive a copy of the personal data that we hold and to check that we are lawfully processing it. Please note that in most circumstances, we shall not make a charge for this. However, we may charge a reasonable fee based on administrative costs for any further copies requested.

Right to Rectification

An individual has the right at any time to ask us to rectify any personal data that we hold about him or her and which is incorrect or incomplete. This enables the individual to have corrected any incomplete or inaccurate data that we hold, though we may need to verify the accuracy of the any new data that the individual provides to us.

If we have disclosed any incorrect or incomplete data to any third parties, we shall inform them of any necessary amendments or corrections made to the personal data of the individual concerned.

Right to be Forgotten

An individual has the right at any time to ask us to erase the personal data that we hold about him or her if:

1. it is no longer necessary for us to handle that personal data for the purpose for which it was originally collected;
2. the individual has withdrawn consent for us to hold that personal data (where consent was the basis on which it was collected or used);
3. the individual objects to the processing of the data and there is no lawful overriding reason for us to continue processing it;
4. the personal data was unlawfully processed; or
5. we have to erase the personal data in order to comply with a legal obligation.

Please note, however, that we may not always be able to comply with a request of erasure for specific legal reasons: in that event we shall inform the individual of those reasons at the time when erasure is requested.

Restriction of Processing

An individual may ask us to restrict how we use his or her data in the following circumstances:

1. where the individual believes that the personal data we hold about him or her is inaccurate, he or she may ask that we refrain from using that data until we can verify the accuracy of it;
2. where we have unlawfully processed personal data, the individual may ask that we restrict our usage of it rather than erase it completely; or
3. where the individual has objected to our use of his or her personal data but we need to verify whether we have overriding legitimate grounds to use it.

Where we no longer need to hold personal data, the individual may nevertheless require us to retain it for the purpose of establishing, exercising or defending a legal claim; or

Data Portability

An individual has the right to obtain from us all personal data which he or she previously provided to us in a structured, commonly used and machine readable form, provided that such data was processed based on the individual's consent, or for the purpose of a contract between us, and the processing was carried out by automated means. This right only applies to automated information for which the individual originally provided consent for us to use or where we used the information to perform a contract with the individual personally.

This will allow an individual to move, copy or transfer personal data easily from one IT environment to another (for example, if the individual wishes to change legal advisers). Alternatively, we can transmit such data directly to another organisation.

Please note that we shall not be able to comply with a data portability request if this will affect the rights and freedoms of others.

Right to Object

An individual has the right to object, on grounds relating to his or her particular situation, to our processing of his or her personal data where we are doing this for the performance of a task carried out in the public interest (about which we shall have advised the individual, if applicable), or where we are carrying out processing for the purposes of legitimate interests pursued by us.

An individual also has the right at any time to ask us not to process his or her personal data for direct marketing or profiling purposes (to the extent that such profiling is related to such direct marketing). We shall have informed the individual prior to obtaining his or her personal data whether we intend to process that personal data for this purpose, or if we intend to disclose it to any third party for such purposes.

If we process personal data for automatic decision making or profiling purposes (i.e. to analyse or predict an individual's personal preferences or transaction history, and such profiling is automated) we shall inform the individual in advance, and will only do this where this is a necessary condition of entering into a contract between the individual and us, or where the individual has given us explicit consent to do so.

Right to Withdraw Consent

Where an individual has given consent to the processing by us of any personal data, he or she has the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn. If an individual withdraws consent, we may no longer be able to provide legal advice or services to the individual or to the individual's organisation. We shall advise the individual (and, if applicable, may inform other individuals in the same organisation) if this is the case at the time when consent is withdrawn.

In addition to any other way in which we make available to individuals the ability to withdraw consent to the processing of personal data, an individual may also withdraw consent at any time by contacting us at gdpr@stephengeorge.co.uk.