

# PRIVACY NOTICE

Adempi Associates LLP (“Adempi” or “we”) is a limited liability partnership registered in England and Wales with registered number OC428172. Our registered office is 71 – 75 Shelton Street, WC2H 9JQ. We are registered with the Information Commissioners Office (ICO) for data protection purposes. This Privacy Notice sets out how and why we process any Personal Data we collect from you, or that you provide to us.

Personal Data means information that could identify individuals such as clients, contacts or suppliers. Special Category Personal Data is Personal Data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic and biometric data, and data concerning health, sex life or sexual orientation.

## 1. What data do we collect?

We collect data as follows:

- **People who use or enquire about our services**

We ask for your Personal Data as it enables us to provide our service to you. This information may include your name, address and telephone number and other information to enable us to check your

identity. It may also include your contact details and information on why you are looking for our advice. We collect most data directly from you. However, we may also collect information from other publicly accessible sources such as Companies House and social media services, such as Twitter, or LinkedIn.

If we assist you with completing online applications, we may by virtue of this, collect wider information on you, including but not limited to your previous employment, directorships, national insurance details and in some circumstances your financial status.

If we do collect personal information that is considered to be Special Category Personal Data, we will only process that data if there is a valid reason for doing so and where the GDPR allows us to do so.

### • **Visitors to our website**

Our website uses cookies to record visits to the website (www.adempi.com). This helps us to improve our website and in turn provide you with a better experience when you are browsing. When someone visits our website we use a third party service, we may use Google Analytics to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

We may collect Personal Data from visitors to our website or from people who subscribe to our

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newsletters, seminars or other publications. The data collected will depend on why you use our website, but may include your name, email address, telephone number and home address and information on why you are contacting us.

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## 2. How will we use your data?

We can only use your Personal Data if we have a proper reason for doing so, e.g.

- to comply with our legal and regulatory obligations;
- for or in the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

We use the data we collect to provide professional services to you and for the performance of our contract with you. We may use the data to comply with legal or regulatory obligations placed on us, for example to complete statutory or regulatory returns or during an audit of the Firm.

We may also use the data for statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, work type or other efficiency measures or in relation to diversity monitoring.

Where we engage individuals or organisations to carry out services for us we may be required to process Personal Data of the service provider or its personnel in order to facilitate the provision of the service. We may also collect and retain information to enable us to evaluate that service.

In the course of providing you with our services, you may provide us with personal data of individuals who are not aware of our involvement or of our processing of their personal data (for instance, personal data of employees in the course of an FCA application). In such situations, we are not likely to have any direct contact with individuals whose personal data we are processing, or it may for other reasons (for instance, to maintain confidentiality) not be appropriate for us to provide them with a privacy notice setting out how we process their personal data. Before you pass any such personal data to us, you must therefore ensure that the relevant individuals have received any requisite privacy notices in connection with the performance of our services. Additionally, please direct any individuals who interact with us on your behalf to this Privacy Notice, a link to which is also contained in the footer of our emails.

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### 3. How do we use your data for marketing?

We may use your Personal Data to send you updates (by email, telephone or post) about industry developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services or products.

We have a legitimate interest in processing your Personal Data for these purposes (see above **‘How will we use your data?’**). This means we do not usually need your consent to send you these communications. However, where consent is needed, we will ask for this consent separately and clearly. You have the right to withdraw this consent at any time.

We will always treat your Personal Data with the utmost respect and never sell or share it with other organisations outside Adempi for marketing purposes. We may however use your data for marketing our services to existing and former clients and third parties who have expressed an interest in our services.

If you would prefer not to receive any promotional communications, you can request this at any time by:

- emailing your request to [contact@adempi.co.uk](mailto:contact@adempi.co.uk); or
- using the ‘unsubscribe’ link in emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

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### 5. How is your Personal Data kept and held?

Your Information will be stored in a secure data centre. We have appropriate security measures to prevent Personal Data from being accidentally lost or used or accessed unlawfully. We limit access to your Personal Data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected Data Security Breach.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe



Online is supported by HM Government and leading businesses.

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## 6. Do we ever share your information abroad?

To deliver services or manage our relationship with you, it is sometimes necessary for us to share your Personal Data outside the European Economic Area (EEA), for example if you or your parent company is based outside the EEA or if there is an international dimension to the matter in which we are advising you.

Many non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, take reasonable steps to ensure any such supplier has in place appropriate measures to protect your information and any contract includes appropriate clauses about the use of data e.g. if the company is based in the USA, we will confirm whether it is accredited under the EU-US Privacy Shield.

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## 7. How long will we keep your Personal Data for?

We will keep your Personal Data after our relationship has come to an end. This is so that we

can respond to any questions, complaints or claims you might have. It may also be to comply with regulation or for business management purposes.

We will not keep your Personal Data for longer than necessary for the purposes you provide it to us and as set out in This Notice. Different retention periods apply for different types of data depending on the nature of the matter you have asked us to advise on and the purpose for which it was collected. Further details are available on request.

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## 8. What are your data protection rights?

It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined below, unless stated otherwise, please do this by either contacting the individual responsible for your matter or by emailing [contact@adempi.co.uk](mailto:contact@adempi.co.uk).

Your rights are as follows:

**You have the right to be told how we will use your data** – which is set out in This Notice. We also provide you with additional notices when you provide us with your Personal Data.



**You have the right to access your data** - we will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity.

**You have the right to have your records rectified** - if you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

In some cases, **you have the right to be forgotten** - that is to have your Personal Data deleted from our database. Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.

**You have the right to restrict the processing** of your data in certain circumstances, because there is some disagreement about its accuracy or legitimate usage.

**You have the right to object to us processing data** purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims.

**You have the right to data portability** – in certain circumstances, you have the right to request us to transfer your data to another company or to you.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

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## 9. How to raise a concern

We hope that we can resolve any query or concern you may raise about our use of your information. Please do contact us on [contact@adempi.co.uk](mailto:contact@adempi.co.uk) if you have any questions or concerns.

You also have the right to raise your concerns with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

The ICO's address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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## 10. Changes to the terms of This Notice

We may change This Notice from time to time, when we make any significant changes we will inform you via a notice on our website and within our email footers. Where it is practicable, we will notify you directly if there are any material changes to This Notice. However, we encourage you to review This Notice periodically to be informed of how we use your Personal Data.

We will only notify individuals who are directly engaging with us about these changes. We will not notify any third parties whose Personal Data we process during the provision of our services.

