

Privacy Information Notice

Our policy is to collect only the personal data necessary to allow us to carry out your instructions and in accordance with our agreed contractual terms and conditions. It is also to ensure that we comply with our legal and regulatory obligations. We ask all our clients only to share their own personal data, or that belonging to any third party you give to us, is strictly needed and necessary for those purposes.

We do not knowingly collect data relating to children.

It is important that you read this policy together with any other privacy notice or policy information provided on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Policy supplements any other notice and is not intended to override them.

Who we are

Rivergate Legal Ltd of 3 Temple Quay, Bristol BS1 6DZ is the Data Controller.

Rivergate Legal Limited is part of the Curtis Banks Group Plc which also includes Curtis Banks Limited, Suffolk Life Annuities Limited, Suffolk Life Pensions Limited and other associated subsidiaries (“the Curtis Banks Group”).

Our use of your personal data is subject to your instructions, relevant data protection legislation and our duty of confidentiality. Further detail of how we share your data is set out below.

The Data Protection Officer for Rivergate Legal Limited is:

Gemma Millard, Head of Legal Practice
Email: gemma.millard@rivergatelegal.co.uk
Tel: 0117 440 5001.

Collection of your personal data

Personal Data, or personal information, is any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

Where we need to process personal data to carry out your instructions, we will process the following categories or types of personal data, as appropriate for the instructions you provide about you or your employees or your clients and the nature of the services we are delivering:

- Full name and title;
- Permanent residential billing address or delivery address;
- Email address;
- Mobile / Landline Telephone Number;
- Date of Birth;
- Identify verification information;
- Agents details;
- Bank Account Details;

- Business activities includes information about you or your employees or clients which you have disclosed in order to obtain legal or practical advice from us;
- Income, taxation and other financial-related details relevant to the transaction we are instructed to advise you in connection with; and
- Investments and other financial interests in so far as that information is relevant to identify any source of funding for any transaction we are instructed to deal with on your behalf.

For certain services or activities, and when required by law or with an individual's consent, we may also collect special categories of personal data. Examples of special categories include race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records. We do not share sensitive personal data with any their parties without your express written consent in the case of individual client's.

Generally, we collect personal data direct from our clients via our standard instruction details forms, by email or phone or from a third party acting on the instructions of the relevant client.

How we use your personal data

We use personal data for the following purposes:

Providing professional services

We provide professional legal services in the areas of Commercial Property and Landlord and Tenant. Some of our services require us to process personal data in order to provide advice and to carry out your instructions and deliverables. For example, we need to use personal data to provide individual advice concerning the registration of a property or requirements for a Lease.

Administering, managing and developing our business and services

We process personal data in order to run our business, including:

- Managing our relationship with clients;
- Developing our business and services (such as identifying client needs and improvements in service delivery);
- Maintaining and supporting IT systems and security of those systems;
- Hosting or facilitating the hosting of events; and
- Administering and managing our website and systems and applications.
- Statistical analysis
- Audit and debt collection

Security, quality and risk management activities

We have robust security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures. As part of our client and engagement acceptance, we carry out searches using publicly available sources (such as internet searches and sanctions lists) to identify politically exposed persons and heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular client (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

Providing our clients with information about us and our range of services

With your consent we use client contact details to provide information that we think will be of interest

about us and our services. For example, industry updates and insights, other services that may be relevant and invites to events.

Complying with any requirement of law, regulation or a professional body of which we are a member

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

How we share your data

We may share your personal data (including storage and transfer of data) with:

- Agents, third parties or organisations selected by you to act on your behalf in relation to services offered by us (e.g. Letting Agent or Financial Adviser) and for whom you have given prior consent for us to share personal information.
- With third parties in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies in the detection or prevention of unlawful acts, credit reference agencies and auditors.
- Our service providers and agents (including their sub-contractors) or third parties who process information on our behalf in relation to, for example, payment processing, printing services and bulk communication purposes, internet services.
- Any third party in the context of actual or threatened legal proceedings provided we can do so lawfully.

We do not share your personal data with any third parties for marketing purposes.

Group Companies

It is important that Rivergate Legal Limited and the other corporate entities within the Curtis Banks Group work separately. Rivergate Legal Limited is the only company in the Curtis Bank Group authorised to perform reserved legal activity.

Client information will not be shared between Curtis Banks Group. Any risks to the sharing or passing of data will be identified and mitigated by robust internal procedures, appropriate staff training and formal contractual restraints.

How we collect, hold, maintain and store or retain your data

Different methods of collection can be used including;

- Publicly available sources such as Companies House or H M Land Registry.
- Third Parties such as another client whom has referred you to us or another service provider who has referred to use such as a Solicitors, an Accountant, a Financial Advisor or SIPP Operator.
- Automated technologies or interactions such as through our website which is collected automatically through the use of cookies or similar technologies.
- Direct Interactions, you may give us your identity, contact information and transaction details by filling in forms or corresponding with us by email, post or by telephone.

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 7 years.

Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you) but always in accordance with our Management Information and Data Retention Policy.

Security of your data

We have implemented procedures to protect your personal details and monitor our performance regularly. All information you provide to us is stored on secure servers to guard against unauthorised or unlawful processing and against accidental loss, destruction or damage.

If you (or any Agent acting on your behalf) contacts us for details of your file or information on our services, we will ask some questions to establish you (or your Agent's) identity and will not disclose any personal and/ or account information, under any circumstances, unless we are satisfied that you (or your Agent) are who you claim to be.

Although we use market standard security software and will take all reasonable precautions to protect information sent electronically, we do not warrant, represent or guarantee the security of your personal information which is transmitted via the internet to our websites, applications or services or to other websites via a similar connection.

Your data and your rights

If you are based within the EEA you have the following rights:

- To be informed on how we obtain and use your information.
- To ask for a copy of the information that we hold about you.
- To have your information rectified.
- To request us to restrict processing of your personal data.
- To have your information erased (Right to be forgotten).
- To object to the processing of your information (E.g. for direct marketing purposes).
- To have information you provided to us, returned to you or sent directly to another company, in a structured, commonly used and machine-readable format where technically feasible (Data Portability).
- Where the processing of your information is based on your consent, the right at any time to withdraw that consent.
- To object to any decisions based on the automated processing of your personal data, including profiling.
- To lodge a complaint with the Information Commissioner's Office (ICO), the supervisory authority responsible for data protection matters.

You cannot opt out of receiving regulatory or legal information or updates (e.g. information about a change in our standard terms and conditions).

If you fail to provide personal data or where you withdraw consent to its use

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 or supply the service we have or are trying to enter with you. In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

If you withdraw your consent to the processing of your personal information or you ask for your information to be erased, we may not be able to provide you with a comprehensive or full service in accordance with your instructions. We will notify you if this is the case at the time.

Changes to our Privacy Information Notice or Policy

We reserve the right to change, modify or adjust this notice from time to time; however we will not reduce your rights under this Privacy Notice. This notice was last updated in March 2018.

Any changes we may make to our our notice in the future will be advised to you.

