

Privacy notice

March 2024



Introduction

RIAA Barker Gillette (UK) LLP (“Firm”, “we” or “us” “our”) respects your privacy and is committed to protecting your personal data (**Your Data**). This notice is to help you understand what data we collect, why we collect it and what we do with it.

The Firm is affiliated with firms outside of the European Economic Area (**EEA**), details of which can be found at www.riabarkergillette.com/uk/alliance (**Affiliated Firms**). Please note that this notice will only apply to how this Firm is responsible for processing Your Data.

This Privacy Notice is provided in a layered format, so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this notice.

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1. Important information about who we are

The purpose of this notice

This notice aims to give you information on how we collect and process Your Data.

It is important that you read this notice together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing data about you so that you are fully aware of how and why we are using Your Data. This notice supplements the other notices or policies and is not intended to override them.

This notice is not intended for children. We do not collect data relating to children except where it is provided by you in the nature of an instruction with us.

Controller

RIAA Barker Gillette (UK) LLP is the data controller and is responsible for all personal data received and held by the Firm. We have appointed a data protection leader (**DPL**) who is responsible for overseeing questions in relation to this notice. If you have any questions about this notice, including any requests to exercise Your legal rights, please contact the DPL using the details set out below:

Full name of legal RIAA Barker Gillette (UK) LLP entity:

Name or title of DPL: M. Qaiser Khanzada
Email address: qaiser.khanzada@riaabg.com
Postal address: 18 Cavendish Square
London
W1G 0PJ
Telephone number: 020 7299 6901

If you have any queries, concerns or complaints about the use of Your Data by us, please raise them with the DPL. If this does not resolve the problem to your satisfaction, or if you prefer to raise the issue with somebody else, please speak to our client care partner, [Vinay Verma](#), who will deal with your complaint. 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the notice and your duty to inform us of the changes

This version was last updated in March 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if Your Data changes during your relationship with us.

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, which includes not only individuals in their personal or private capacity but also directors and owners of bodies corporate. It does not include data where a person's identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of data about you, which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes billing address, home address, email address and telephone numbers.

Employment Data includes job role, salary, annual leave, employer, immigration, pension and benefits information.

Financial Data includes bank account and payment card details.

Matter Data includes any information you provide to us concerning you and your circumstances for the Performance of the Contract.

Transaction Data includes details about payments to and from you and other details of services you have purchased from us.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect and use **Aggregated Data**, such as statistical or demographic data, for internal purposes. Aggregated Data may be derived from Your Data but is not considered personal data, in law, as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with Your Data so that it can directly or indirectly identify you, we treat the combined data as personal data that will be used in accordance with this notice.

We may be required to collect **Special Categories** of Your Data (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 for example; fingerprints) including information about criminal convictions and offences for the provision of our services. This will be in the Performance of a Contract. Unless we are required to collect Special Categories of Your Data for the Performance of a Contract, we will not collect this data without your express consent.

3. If you or any third party fails to provide the required data

Where we need to collect Your Data (or any other person's data) by reason of our legal obligations or for the Performance of a Contract and that data is not provided when requested, we may not be able to provide our services under our Contract. In this case, we may have to cancel the Contract, but we will notify you if this is the case at the time.

4. How is your data collected?

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

Direct interactions. You may give us your Identity, Contact, Employment and Financial Data by filling in forms, or by corresponding with us by post, phone, email, through our website or otherwise.

Automated technologies or interactions. If you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We have activated Google Analytics Anonymisation which means that any data collected in this manner is not personal data because it is anonymised. Please see our Legal Notice (www.riaabarkergillette.com/uk/legal-notice/) and Website Privacy Policy (www.riaabarkergillette.com/uk/website-privacy-policy/) for further details.

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

- Identity, Contact, Financial, Transaction, Matter and Employment Data from third parties connected with the Performance of the Contract, including counterparties and their representatives.
- Identity Data from the following parties:
 - advertising networks;
 - online credit checks; and
 - search information providers.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as:

Name	Location
Eventbrite	US (Standard Contractual Clauses (SCCs))
Lloyds Bank	EU
Mailchimp	US (Standard Contractual Clauses (SCCs))
Office365	Microsoft EU

- Identity and Contact Data from data brokers or aggregators such as Chartered Developments based in the UK or inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register, which are based in the UK or inside the EU.

Name	Location
Civil Court Digital Case System	UK and EU
Companies House BETA	UK and internal to Companies House

Name	Location
Companies House Direct	Servers internal to Companies House
Companies House Online Filing	Servers internal to Companies House
Crown Court Digital Case System	UK
Family Court Digital Case System	UK
HM Land Registry (www.gov.uk/help/privacy-notice#where-your-data-is-stored)	EEA
HM Land Registry (Business eServices/Portal)	UK
Tribunal Digital Case System	UK and EU
HM Revenue & Customs, the UK's tax, payments and customs authority (www.gov.uk/government/organisations/hm-revenue-customs)	UK

- Identity and Contact Data from third parties including professional and advisory organisations such as:

Name	Location
AML Search (Searches Group Limited)	UK
Accountants and tax advisers	UK
Barristers	UK
Courts	UK
CRIF Decision Solutions Ltd	UK
Document Direct	UK
Firmex	Canada – same rules as EU
GB Group plc	UK

Name	Location
inCase (Lavatech Ltd)	UK
InfoTrack Limited	UK
TransUnion International UK Limited	UK (with operations also in Lithuania and Spain)
LawLeague (Conscious)	Ireland (EU)
Lawyers	UK, EU and outside the EEA
LinkedIn	US (SCCs)
MoneyPenny	UK
Recruitment Agents	UK
ReviewSolicitors	UK
SmartCredit Limited t/a SmartSearch (via the inCase app)	UK

5. How we use your data

We will only use Your Data when the law allows us to and in accordance with our obligations to our clients. Most commonly, we will use Your Data in the following circumstances:

- In anticipation of and in connection with the Performance of the Contract.
- 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.

See “Purposes for which we will use your data” to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing Your Data. You have the right to opt-out of us using Your Data for marketing purposes at any time by using the unsubscribe button in any email communication or emailing info.uk@riaabg.com.

6. Purposes for which we will use your data

In the table below, we describe all the ways we plan to use Your Data and which of the legal bases we rely on to do so. We have also identified what our legitimate

interests are where appropriate. Where any of Your Data is collected only for the purposes of complying with our obligations under legislation relating to the prevention of money laundering and terrorist financing, it will only be used for those purposes and any other purpose to which you have provided consent.

Note that we may process Your Data for more than one lawful ground depending on the specific purpose for which we are using Your Data. Please email info.uk@riaabg.com if you need details about the specific legal ground we are relying on to process Your Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new client and provide services to you in relation to new matters	(a) Identity (b) Contact (c) Financial (d) Matter (e) Employment	Performance of a Contract with you
To manage our relationship with you, which will include: (a) Notifying you about changes to our terms or privacy notice; and (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Matter (d) Marketing and Communications	(a) Performance of a Contract with you (b) Necessary to comply with a legal obligation (c) Legitimate Interest (for the purposes of Marketing and Communications)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact	(a) Performance of a Contract with you (b) Necessary to comply with a legal obligation

Purpose/Activity	Type of data	Lawful basis for processing
To deliver relevant website content, legal content and updates to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Legitimate Interest
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Matter	Legitimate Interest

7. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity and Contact Data to determine what we think you may want or need or what may interest you. This is how we decide which products, services, and offers may be relevant to you (we call this marketing).

We will send you marketing communications. As described below, you have the right to opt out at any time.

Third party marketing

We will not share Your Data with any third party for the marketing purposes of any company outside the Firm.

Opting out

You can ask us to stop sending you marketing messages anytime by emailing info.uk@riaabg.com or clicking an email unsubscribe link.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, product/service experience or other transactions.

8. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy (www.riaabarkergillette.com/uk/cookies-policy).

9. Change of purpose

We will only use Your 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 you want an explanation of how the processing for the new purpose is compatible with the original purpose, please email info.uk@riaabg.com.

If we need to use Your Data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process Your Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10. Disclosures of your data

We may have to share Your Data with the parties set out below for the purposes set out in "Purposes for which we will use your data" above.

- Information sent using the contact entry forms on our website is received by the Firm's partners, staff, and a partner of our affiliated office in Dubai.
- If you send your data to us through the RIAA Barker Gillette App, where we are acting for you as one of a number of joint clients, your data may be accessed through the App not only by you and the Firm but also the other joint clients on the matter for whom we also act. If you have retained us on a joint basis with someone else and do not wish that person to access your data, please do not send or upload your data on the RIAA Barker Gillette App.
- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- 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, the new owners may use Your Data in the same way as set out in this notice.

We require all third parties to respect the security of Your Data and treat it in accordance with the law. We do not allow our third-party service providers to use Your Data for their own purposes and only permit them to process Your Data for specified purposes and in accordance with our instructions.

11. International transfers

We may share Your Data with Affiliated Firms where necessary in relation to the Performance of the Contract. This will involve transferring Your Data outside the EEA.

Some of our external third parties are based outside the EEA, so their processing of Your Data will involve transferring data outside the EEA.

Whenever we transfer Your 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 Data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK, which give personal data the same protection it has in the UK.

Please email info.uk@riaabg.com if you would like further information on the specific mechanism we use when transferring Your Data out of the EEA.

12. Data security

We have put in place appropriate security measures to prevent Your Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Your Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Your 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.

13. Data retention

How long will you use my personal data?

We will only retain Your 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 Your Data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of Your Data, the purposes for which we process Your Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

During the provision of our legal services to you we will retain Your Data to perform the contract. We are required by law to retain specific categories of Your Data for certain periods after you cancel your contract with us. The data retention periods vary depending on the type of legal services we provide to you and complying at all times with anti-money laundering regulations. Please refer to our Data Retention Policy (www.riaabarkergillette.com/uk/data-retention-policy/) for the periods in which we will retain your data.

14. Your legal rights

In certain circumstances, you have the following rights under data protection laws in relation to Your Data. You have the right to:

Request access to Your Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Your 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 Data. This enables you to ask us to delete or remove Your Data when there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove Your 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 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 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 your fundamental rights and freedoms. You also have the right to object to where we are processing Your Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which overrides your rights and freedoms.

Request restriction of processing of Your Data. This enables you to ask us to suspend the processing of Your Data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful, but you do not want us to erase it;
- 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
- 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 Data to you or a third party. We will provide you, or a third party you have chosen, with Your 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 when we are relying on consent to process Your 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.

If you wish to exercise any of the rights set out above, please email info.uk@riaabg.com.

15. No fee is usually required

You will not have to pay a fee to access Your 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.

16. 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 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.

17. 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.

18. Glossary

Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process Your Data for our legitimate interests. We do not use Your Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you with respect to specific activities by emailing info.uk@riaabg.com.

Performance of the Contract means processing Your Data in connection with our obligations under our contract or retainer to which you are a party or taking steps at your request before entering into such a contract.

Complying with a legal or regulatory obligation means processing Your Data, where necessary, for compliance with a legal or regulatory obligation that we are subject to.

Consent means processing Your Data where you have given us clear consent to do so for a specific purpose.

Third parties

Internal Third Parties means Affiliated Firms with the Firm acting as joint controllers or processors and who are based in Pakistan and the United Arab Emirates.

External Third Parties means service providers acting as processors based in the UK and elsewhere who provide IT and system administration or other services:

Category of disclosure recipient	Sub-category of disclosure recipient
Federal, state, and local law enforcement officials, bodies or regulators	ACAS CAFCASS Courts HMRC Land Registry Law enforcement agencies Office of the Public Guardian Regulatory authorities State official Tribunals
In the context of legal proceedings or contemplated legal proceedings or in the provision of legal services to you	Attorneys Lawyers (opponent) Litigants in Person
Professional and advisory services	Accountants Adjudicators Arbitrators Barristers Computer Analysts Costs Draftsmen Experts Financial services Foreign Lawyers Insolvency Practitioners Mediators Medical Professionals Memberships
Third-party service provider	Banks Broker Business development Consultant Courier/postage Direct marketing Directory Education, training, and development Feedback services Financial services IFAs Information security

Category of disclosure recipient	Sub-category of disclosure recipient
	Insurers IT system management/telecommunications Landlord Miscellaneous Office supplier Payroll administration Private Investigators Process Servers Professional Memberships Recruitment agents Resources Social Media Software/hardware Storage/archiving/data destruction Strategic Consultant Tax Advisers Transport Utilities Web services

