

# Website privacy policy

March 2024



## Introduction

RIAA Barker Gillette (UK) LLP (“Firm”, “we” or “us” “our”) respects your privacy and are committed to protecting your personal data (**Your Data**). This policy will inform you as to how we look after Your Data when you visit our [website](#) (regardless of where you visit it from) and your privacy rights and how the law protects you. Please note that this policy is specific to Your Data sent by you to our website and does not apply more generally to any personal data provided to us by other means.

The Firm is affiliated with firms outside of the European Economic Area (**EEA**), details of which can be found [here](#) (**Affiliated Firms**). Please note that this privacy policy will apply only to how this Firm is responsible for processing Your Data.

This policy is provided in a layered format, so that 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 policy.

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## 1. Important information about who we are

### The purpose of this website privacy policy

This policy aims to give you information on how we collect and process Your Data through your use of this website, including any data you may provide through this website when you sign up to our legal updates or submit an enquiry to us.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this policy 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 policy supplements the other notices and is not intended to override them.

### Controller

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

|                            |                                       |
|----------------------------|---------------------------------------|
| Full name of legal entity: | RIAA Barker Gillette (UK) LLP         |
| Name or title of DPL:      | M. Qaiser Khanzada                    |
| Email address:             | qaiser.khanzada@riaabg.com            |
| Postal address:            | 18 Cavendish Square<br>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, then please speak with 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. 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 website privacy policy 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.

## Third party links

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 policy of every website you visit.

## 2. The data we collect about you

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

**Financial Data** includes bank account and payment card details.

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

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

**Personal data or personal information**, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of data about you which we have categorised as follows:

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Special Category Data** includes personal data revealing racial or ethnic origin, personal data revealing political opinions, personal data revealing religious or philosophical beliefs, personal data revealing trade union membership, genetic data, biometric data (where used for identification purposes), data concerning health, data concerning a person's sex life; and data concerning a person's sexual orientation.

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

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 personal data as it does **not** directly or indirectly reveal your identity. For example, we may aggregate information about how you use our website and services to calculate the percentage of users accessing a specific website feature, but this is anonymised. 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 which will be used in accordance with this policy.

## 3. If you fail to provide data

If you choose not to send Your Data through the website, you will need to contact us by other means as we will not be able to identify who you are through any website interaction.

## 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 and Financial Data by filling in forms, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- make an online enquiry;
- make an online payment (to be implemented in due course);
- subscribe to our services or publications;
- request marketing material to be sent to you;
- provide us with feedback.

**Automated technologies or interactions.** As 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](#) for further details.

**Third parties or publicly available sources.** We may receive Identity Data, Contact Data and Special Category Data from and about you via various third parties and public sources as set out below:

| Name                      | Location                                 |
|---------------------------|--|
| CookieYes                 | London, UK and Ireland EU                |
| LawLeague (Conscious)     | Ireland EU                               |
| <a href="#">Mailchimp</a> | US (Standard Contractual Clauses (SCCs)) |
| MoneyPenny                | UK                                       |
| Office365                 | Microsoft EU                             |
| ReviewSolicitors          | UK                                       |

## 5. How we use your data

We will only use Your Data when the law allows us to. 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” below 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. Where we do, you have the right to withdraw Consent at any time by using the unsubscribe button in any email communication.

## 6. Purposes for which we will use your data

Below, in a table format, we have described all the ways we wish to use Your Data and which legal bases we rely on. We have also identified what our legitimate interests are where appropriate.

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 contact [info.uk@riaabg.com](mailto: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   | (a) Identity<br>(b) Contact<br>(c) Financial                    | Performance of a Contract with you  |
| To manage our relationship with you which will include:<br><br>(a) Notifying you about changes to our terms or website privacy policy; and<br><br>(b) Asking you to leave a review or take a survey | (a) Identity<br>(b) Contact<br>(c) Marketing and Communications | (a) Performance of a Contract with you<br><br>(b) Necessary to comply with a legal obligation<br><br>(c) Legitimate Interest (for the purposes of Marketing and Communications) |
| To administer and protect our business and this website where you submit an online enquiry  | (a) Identity<br>(b) Contact                                     | (a) Performance of a Contract with you<br><br>(b) Necessary to comply with a legal obligation   |

| Purpose / Activity  | Type of data  | Lawful basis for processing |
|---|---|-----------------------------|
| To deliver relevant website content and legal content and updates to you and measure or understand the effectiveness of the marketing material we send to you | (a) Identity<br>(b) Contact<br>(c) 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<br>(b) Contact                                     | 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 form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us. You have the right of Opting-Out at any time as described below.

### 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 at any time by emailing [info.uk@riaabg.com](mailto:info.uk@riaabg.com) or by clicking on 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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie 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 wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email [info.uk@riaabg.com](mailto:info.uk@riaabg.com). Should we need to use Your Data for an unrelated purpose, we will notify you and we will 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 the table in "Purposes for which we will use your data" above.

- Information sent using the contact entry forms on the team and contact page are received by partners and staff of the Firm and a partner of our affiliated office in Dubai.
- 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. If a change happens to our business, then the new owners may use Your Data in the same way as set out in this policy.

We require all third parties to respect the security of Your Data and to 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

In addition to the disclosures set out in “Disclosures of your data” above, some of our external third parties are based outside the EEA so their processing of Your Data will involve a transfer of 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](mailto:info.uk@riaabg.com) if you want further information on the specific mechanism used by us 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

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.

Where you become a client and Your Data is used in relation to our retainer, please refer to our [Privacy Notice](#). Please also refer to our [Data Retention Policy](#) for our data retention/destruction protocol.

## 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 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 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 on your fundamental rights and freedoms. You also have the right to object 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 override 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 to a third party. We will provide to you, or a third party you have chosen, 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** where 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](mailto:info.uk@riaabg.com) or telephone 020 7636 0555 and ask to speak to a partner.

## 15. No fee 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 in respect of specific activities by emailing [info.uk@riaabg.com](mailto:info.uk@riaabg.com).

**Performance of Contract** means processing Your Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing Your Data where it is 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 services.

