

PRIVACY NOTICE

Welcome to the Prior + Partners website privacy notice.

Prior + Partners Ltd respects your privacy and is committed to protecting your personal data in accordance with the UK GDPR, EU GDPR, and the Data Protection Act 2018 (“DPA 2018”). This website privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you online.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this website privacy notice

This website privacy notice aims to give you information on how Prior + Partners Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsfeed.

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

It is important that you read this website privacy notice together with any other privacy notice or fair processing notice we may provide 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 website privacy notice supplements the other privacy notices and is not intended to override them and shall confirm compliance with the UK GDPR, EU GDPR and DPA 2018.

Controller

Prior + Partners Ltd is the controller and responsible for your personal data (collectively referred to as “Prior + Partners”, “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this website privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Full name of legal entity: Prior + Partners Ltd

Name of data privacy manager: Katie Brewer

Email address: info@priorpartners.com

Postal address: 70 Cowcross Street, London, EC1M 6EJ

Telephone number: +44 (0)20 3951 0052

You have the right to make a complaint at any time to the Information Commissioner’s Office (“ICO”), the UK Information Commissioner is the 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 privacy notice and your duty to inform us of changes

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.

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 notice of every website you visit.

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. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal 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 website privacy notice.

We do not collect any Special Categories of Personal Data about you (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). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

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 we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL 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:

- apply for our products or services;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback

Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookies 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:

- Technical Data from the following parties:
 - analytics providers such as Google based outside the UK;
 - advertising networks; and
 - search information providers such as Google based outside the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. HOW WE USE YOUR PERSONAL DATA

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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email if you are an individual subscriber – residential subscribers (consumers), sole traders, non-limited liability partnerships. You can withdraw consent to such direct marketing communications at any time by contacting our data privacy manager at info@priorpartners.com or +44 (0)20 3951 0052.

We rely upon our legitimate interests as a commercial organisation promoting our business as the legal basis for sending any direct marketing communications to corporate subscribers (limited companies in the UK, limited liability partnerships). You can opt-out of receiving further marketing communications from us at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our data privacy manager if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver our products and services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us or to provide products and services to our clients)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)
To administer and protect our business	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile 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 direct marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting our data privacy manager at info@priorpartners.com or +44 (0)20 3951 0052.

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

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 cookies policy.

Change of purpose

We will only use your personal 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 contact our data privacy manager.

If we need to use your personal data for an unrelated purpose for which we originally collected it for, we will notify you and we will explain the legal basis which allows us to do so.

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

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties including:
 - Service providers who provide IT and system administration services.
 - Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities based in the United Kingdom.
- 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, then the new owners may use your personal data in the same way as set out in this website privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes without your explicit consent to do so at all times and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

The UK GDPR and DPA 2018 restricts data transfers to countries outside the UK in order to ensure that the level of data protection afforded to individuals by the UK GDPR and DPA 2018 is not undermined. You transfer Personal Data originating in one country across borders when you transmit, send, view or access that data in or to a different country

You may only transfer Personal Data outside the UK if one of the following conditions applies:

- the Secretary of State has issued an adequacy regulation confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the Data Subjects' rights and freedoms; or
- appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved by the Secretary of State, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the Data Privacy Manager;
- the Data Subject has provided Explicit Consent to the proposed transfer after being informed of any potential risks in limited circumstances and as a one off transfer; or
- the transfer is necessary for one of the other reasons set out in the UK GDPR or DPA 2018 as an exemption, including the performance of a contract between us and the Data Subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the Data Subject where the Data Subject is physically or legally incapable of giving Consent and, in some limited cases, for our legitimate interest. You are referred to the ICO website at ico.org.uk to review the exemptions in respect of transferring data in this way.

Please contact our data privacy manager if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA SECURITY

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.

8. DATA RETENTION

How long will you use my information for?

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

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers

for tax purposes.

In some circumstances you can ask us to delete your data: see 'Request erasure' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please refer to section 10. GLOSSARY for more information about these rights.

No fee usually required

You will not have to pay a fee to access your personal data by making a subject access request (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.

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 personal 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.

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.

10. 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 personal data for our legitimate interests. We do not use your personal 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 contacting our data protection manager.

"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 personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Your legal rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal 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 personal data. 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.
- Object to processing of your personal 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 personal 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 personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) 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 personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal 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 personal 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.

Prior + Partners

1. WEBSITE COOKIES POLICY

This Cookies Policy explains what cookies are and how we use them. Read this policy to understand what type of cookies we use, the information we collect using Cookies, and how that information is used.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. For further information on how we use, store and keep your personal data secure, see our Privacy Policy.

We do not store sensitive personal information, such as mailing addresses or account passwords, in the cookies we use.

2. DEFINITIONS

For the purposes of this Cookies Policy:

- Company (referred to as either “the Company”, “we”, “us” or “our” in this Cookies Policy) refers to Prior + Partners Ltd, 70 Cowcross Street, London, EC1M 6EJ.
- Cookies means small files that are placed on your computer, mobile device or

any other device by a website, containing details of your browsing history on that website.

- Website refers to Prior + Partners Ltd, accessible from prior+partners.com
- You means the individual accessing or using the website, or a company, or any legal entity on behalf of which such individual is accessing or using the website, as applicable.

3. THE USE OF COOKIES

Cookies can be “Persistent” or “Session” cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while Session cookies are deleted as soon as you close your web browser. We use both session and persistent cookies for the purposes set out below:

Necessary / essential cookies

- Type: Session cookies
- Administered by: Us

Purpose: These cookies are essential to provide you with services available through the website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

Functionality Cookies

- Type: Persistent Cookies
- Administered by: Us

Purpose: These cookies allow us to remember choices you make when you use the website, such as remembering your login details or language preference. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the website.

3. YOUR CHOICES REGARDING COOKIES

If you prefer to avoid the use of cookies on the website, you must first disable the use of cookies in your browser and then delete the cookies saved in your browser associated with this website.

You may use this option for preventing the use of cookies at any time.

If you do not accept our cookies, you may experience some inconvenience in your use of the website and some features may not function properly.

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

- For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, please visit this page from Microsoft: <http://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, please visit this page from Apple: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For any other web browser, please visit your web browser's official web pages.

5. CONTACT US

If you have any questions about this Cookies Policy, you can contact us by email or telephone:

info@priorpartners.com or +44 (0)20 3951 0052.

