

PRIVACY POLICY

1. *OUR COMMITMENT*

Raines & Co is committed to protecting and respecting the privacy of individuals whose personal information we may collect in the course of our business.

This Privacy Policy (together with our engagement Terms of Business) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

We may collect personal data in a number of ways, including:

- through your use of our website;
- when you contact us or request information from us;
- when you instruct us to carry out legal services for you;
- as a result of your relationship with members of our staff or clients; and
- if you are a current member of staff, a job applicant or a work experience student.

If you have any queries regarding this Privacy Policy or complaints about our use of your information please contact us and we will do our best to deal with your complaint or query as soon as possible.

For the purposes of the Data Protection Act 2018 (the '**DPA 2018**'), the data controller is Raines & Co, Level 30, The Leadenhall Building, 122 Leadenhall Street, London EC3V 4AB.

2. *PERSONAL INFORMATION THAT WE MAY COLLECT*

Personal information that we collect includes:

- basic personal information, such as your name (including any relevant prefix or title); your company, your position; and your relationship to other people;
- contact information, such as your postal address, email address and telephone numbers;
- financial information relating to you, such as employees' payment-related information in the case of members of staff;
- technical information, such as information from your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data;
- information you provide to us for the purpose of attending meetings and events, including dietary or access requirements;
- information provided by you or collected by us as part of our client acceptance processes; including identification information and other background information;
- personal information provided to us by or on behalf of our clients or generated by us in the course of providing advice to them; and
- any other information which you may provide to us from time to time, including any information you provide us with during the course of an engagement to provide legal services to you and any correspondence when you contact us.

We are obliged to ensure that your personal information is accurate and up-to-date.

Please advise us of any changes to your personal information via the contact email address at the end of this Privacy Policy.

3. *HOW WE USE PERSONAL INFORMATION*

When we request or receive personal information, this may be for one or more of the following purposes:

- to provide and improve our services to you and to our clients, including handling personal information of others on behalf of our clients;
- to inform you of events and developments in the law which we think will be of interest to you;
- for human resources purposes, including recruitment;
- to administer our website and help us to improve our services;
- to issue invoices, manage accounts and records, and for the collection of payments and debts; and
- to allow us to meet our legal, regulatory and risk management obligations (for example, carrying out and maintaining client due diligence, and establishing or defending legal claims).

4. *BASES ON WHICH WE MAY USE YOUR PERSONAL INFORMATION*

We may use your personal information on the following bases:

- to perform our contractual or other obligations, such as the provision of legal services to a client;
- for the establishment, exercise or defence of legal claims or proceedings;
- to comply with our legal, regulatory and risk management obligations; and
- where otherwise we have a legitimate interest in doing so.

We rely on legitimate interests to process personal information in order to carry out client instructions and where we send updates on legal developments and invitations to events. Please advise us immediately if you believe that such legitimate interests do not exist or that they do not justify this. We will respond in writing, with reasons, whether or not we agree, or whether other overriding legal principles justify our processing of your personal information. Please refer also '*Your rights regarding your personal information*' in 8. below.

5. *RETENTION OF PERSONAL INFORMATION*

We will retain your personal information for such period as may be required taking into account the purpose for which the information is collected. That period is based on the requirements of data protection law, taking into account legal and regulatory requirements to retain the information for a minimum period; limitation periods for taking legal action; good practice; and our business purposes.

6. *WITH WHOM WE MAY SHARE YOUR PERSONAL INFORMATION*

We may share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them or in some other circumstances, including:

- our professional advisers and auditors;
- third party suppliers or certain support services such as word processing, translation and photocopying;
- IT and payroll service providers;
- third parties engaged in the course of the provision of legal services with our clients' prior consent, such as barristers, accountants and local counsel;
- third parties involved in the organisation of events and seminars;
- if we are under a duty to disclose or share your personal information in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of Raines & Co, our clients, or other. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- Raines & Co may at some stage re-organise or transfer all or part of its business. This may result in the transfer of your data to third parties through which the whole or part of the business of Raines & Co will be carried out; and
- if Raines & Co ceases to trade, or becomes insolvent, enters into receivership or any similar or equivalent even occurs. In such cases, those acting on behalf of Raines & Co may sell the business or parts of it to a third party, in fulfilment of legal or business requirements. This may result in the transfer of your data to a third party through which the business or parts of it will be carried out.

Whilst it is unlikely, we may be required to disclose your personal information by a court order or to comply with other legal or regulatory requirements.

7. *HOW WE PROTECT YOUR PERSONAL INFORMATION*

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

All our employees and any third parties we engage to process your personal information are obliged to respect the confidentiality of your personal information. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted via our website – any transmission is at your own risk.

In order to provide our services, we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing Raines & Co's website for the purposes set out in this Privacy Policy. This may entail a transfer of your information to a location outside the UK. Please see 'With whom we may share your personal information' in 6. above for more detail on how information may be shared with third party service providers.

The level of protection of personal information in countries outside the UK may be less than that offered within the UK.

8. *YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION*

The DPA 2018 confers certain rights on data subjects.

You are entitled to request details of the information we hold about you and how we process it. You may also have a right in accordance with the DPA 2018 and other applicable data protection law to have your personal information rectified or deleted, to restrict the processing of that information, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to another organisation.

We may require further information from you in order to verify your identity before disclosing any personal information about you.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later wish to withdraw that consent, we will respect that choice so far as it is consistent with our legal obligations.

Your objection or, where relevant, withdrawal of any previously given consent, could mean that we would be unable to perform the actions necessary to achieve the purposes set out above (see '*How we use personal information*' in 3. above) or that you may not be able to use the services offered by us. Even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our own legal rights or meeting our legal and regulatory obligations.

9. *COMPLAINTS*

If you think that there is a problem with the way we are processing your personal information, you have the right to lodge a complaint with the Information Commissioner's Office.

10. *PRIVACY OF ELECTRONIC COMMUNICATIONS AND COOKIES*

Any electronic communication between you and us (or any of our lawyers, other employees or agents) may not be secure and, unless you are already a client, may not be treated as privileged or confidential.

Our website uses cookies. A 'cookie' is a small text file that is sent to your device by a website that you visit and is automatically saved on your device by your web browser. Cookies collect aggregated and anonymous data about our users' browsing.

11. *CHANGES TO THIS POLICY*

We may amend this Privacy Policy and/or the other legal notices at any time. Please check our website www.rainesandco.com periodically to inform yourself of any changes.

12. *CONTACT*

Questions, comments and requests regarding this Privacy Policy should be addressed in an email to info@rainesandco.com or by post to Privacy, Raines & Co, Level 30, The Leadenhall Building, 122 Leadenhall Street, London EC3V 4AB.

October 2022