

## Jonathan Collins & Co. Limited (JCCO) Privacy Notice

JCCO respects your privacy and is committed to protecting your personal data.

### Purpose of this privacy notice

This privacy notice seeks to inform you as to how we look after your personal data collected either (i) when you visit our website (ii) provided by you off line in some manner, or (iii) collected by us separately, in relation to you and our dealings with you and/or any company you are associated with. This privacy notice tells you about your privacy rights and how the law protects you.

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

### JCCO's Policy on Data Privacy

JCCO has adopted the following core principles that govern our use of any personal data, in that it must:

- be processed **fairly** and **lawfully** and to the extent required under local law with valid and informed **consent**;
- be obtained for specific and **lawful purposes**;
- be kept **accurate** and **up to date**;
- be **adequate, relevant and not excessive** in relation to the purposes for which it is used;
- **not be kept for longer than is necessary** for the purposes for which it is used;
- be processed **in accordance with the rights of individuals**;
- be **kept secure** to prevent unauthorised processing and accidental loss, damage or destruction; and
- not be transferred to, or accessed from, another jurisdiction where these core principles cannot be met unless it is adequately protected.

### Important information

JCCO is the controller and responsible for your personal data. Our contact details are:

Full name of legal entity: Jonathan Collins & Co. Limited

Email address: [jc@jonathancollinsandco.com](mailto:jc@jonathancollinsandco.com)

Postal address: Calenick, Trelights, Port Isaac PL29 3TL

Telephone number: 01208 811418

Regulatory body: The Solicitors Regulation Authority

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](http://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.

### Third-party links

Our website may include links to third-party websites. 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.

### 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, maiden name, last name, home address, passport or driving licence number (or copies of these documents), nationality, national insurance number, username or similar identifier, marital status, title, date of birth and gender of you, your spouse, partner, children and other dependents
- **Contact Data** includes billing address, email address and telephone numbers
- **Directorship and Shareholder Data** includes details of your directorship and/or shareholder details in any company for whom we may be instructed to act.
- **Transaction Data** includes details about payments to and from you and other details of services you have instructed us on and information about parties on the other side of a client's transaction, which could be personal data too
- **Financial Data** includes information about your businesses, assets and beneficial interests

#### **How is your personal data collected?**

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

- **Direct engagement.** You may give us your Identity, Contact, Director and/or Shareholder Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

#### **How we use your personal data**

We will only use your personal data when the law allows us to and to enable us to understand your business and perform legal services on your behalf pursuant to any engagement with you. In addition we may in exceptional instances use your personal data where it is necessary for

- our legitimate interests (or those of a third party) and your interests and legal rights do not override those interests or
- Where we need to comply with a legal or regulatory obligation

#### **Legal and Business Updates**

As part of us acting as the legal adviser to our clients we may keep you informed by email of key updates to business or legal issues. If you do not wish to receive these please let us know.

#### **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.

#### **Sharing your data**

We will never share your personal data with third parties unless this is necessary for us to carry out legal and advisory services pursuant to our engagement with you or if we are required to do so by law, court order or regulatory authority with competent jurisdiction.

We do not transfer your personal data outside the European Economic Area without your consent (**EEA**).

#### **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. 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

## Data retention

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, regulatory or reporting requirements. Generally this would be for a period not exceeding 7 years after completion of our last engagement for you.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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.

If you wish to exercise any of the rights set out above, please [contact us](#).

## No fee required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

## Time limit to respond

We try to respond to all legitimate requests for access to personal data 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.