

PRIVACY NOTICE

Please read the following information carefully. This privacy notice contains information about what data we collect and store about you and why. It also tells you whom we share this information with, the security mechanisms we have put in place to protect your data and how to contact us if you have a complaint. We recommend that you read it carefully and retain a copy.

Who we are?

Shakespeare Martineau LLP is a limited liability partnership registered in England and Wales with number OC319029. Its registered office is No 1 Colmore Square, Birmingham, United Kingdom, B4 6AA.

'Lime', 'Corclaim' and 'Marrons Planning' are business names of Shakespeare Martineau LLP.

The members of Shakespeare Martineau LLP are Ampa Holdings LLP, Andrew Whitehead and Sarah Walker-Smith.

Ampa Holdings LLP is a limited liability partnership registered in England and Wales with number OC435936. Its registered office is No. 1 Colmore Square, Birmingham, United Kingdom, B4 6AA. A list of its members is available for inspection at its registered office. Ampa Holdings LLP is a member of Ampa Ventures Limited, a company limited by guarantee (registered number 13254321 in England and Wales) with its registered office at 60 Gracechurch Street, London, United Kingdom, EC3V 0HR.

Neither Ampa Holdings LLP nor Ampa Ventures Limited provide legal or other services to clients.

The members of Ampa Ventures Limited carry on business as separate and autonomous legal entities. They are not one organisation nor partnership, and the members of Ampa Ventures Limited are not in partnership with each other.

Shakespeare Martineau (Glasgow) LLP is a discrete Scottish law firm and a limited liability partnership, registered in Scotland with number SO306986. Its registered office is 272 Bath Street, Glasgow, Scotland, G2 4JR. The members (referred to, day to day, as partners) are Amal Kaur and James Gooch.

In this document references to 'Group' are to Ampa Ventures Limited, members of Ampa Ventures Limited and to subsidiaries of Ampa Holdings LLP.

This notice applies to all entities within the Group. Each of the entities named above is a data controller.

For the purposes of applicable data protection law the Group entity you contract with or which is providing services to you will have responsibility for your personal information. When it does this, it is the 'controller' of this information for the purposes of the UK General Data Protection Regulation, the EU General Data Protection Regulation and other applicable data protection laws.

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 as follows:

- **Identity and Contact Data** includes first name, maiden name, last name, username or similar identifier, passport or other government document identification numbers, education background, work history, job title, tax status, residency status, marital status, title, date of birth, gender, billing address, delivery address, email address, telephone numbers
- **Financial Data** includes bank account and other data necessary for processing payment and transfer and for fraud/theft prevention, including debit and credit card number, security code numbers and other information relevant to billing or the transfer of funds.
- **Business and Transaction Data** includes the services and any products you have purchased from us and information provided during your contractual relationship with any Group entity or otherwise provided by you.
- **Information Relevant to the Advice Supplied to You** including personal data relevant to any case, dispute or other legal advice given to you.
- **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 any passwords to access our systems or portals or services, 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.
- **Your Image:** for example CCTV footage or images taken during meetings or events.
- **Marketing and Communications Data** includes your preferences in receiving marketing information from us, your communication preferences and information about how you use our websites(s), including the services you viewed or searched for, page response times, download errors, length of visits and page interaction information. To learn more about our use of cookies or similar technology please see the “Cookies” section below.
- **Sensitive Personal Data:** whilst acting for you, your employer or your business in relation to legal cases we may have to collect and use sensitive personal data (sometimes referred to as special category data), by which we mean racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life and sexual orientation or details of criminal offences, or genetic or biometric data about you. We may also collect health and religious data for the purposes of access or for dietary requirements.

- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 privacy notice.

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 our services). In this case, we may have to cancel our contract with you but we will notify you if this is the case at the time.

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 obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

In addition, we use personal data for the following additional purposes:

- compliance with legal and/or regulatory obligations and good practice, e.g. completing conflict of interest checks, identifying clients and verifying their identity (including using third party suppliers to do so) and other client on-boarding actions, and preventing money laundering and terrorist financing;
- 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;
- for insurance, audit and accreditation purposes;
- to process applications for employment;
- operational and administrative reasons, such as recording transactions, training, collection of our fee or costs (including if legal proceedings are required) and quality control and Group governance and reporting;

- protect our and/or Group business and this (or another entity within the Group's) website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- data analytics to improve our website, products/services, marketing, customer relationships and experiences;
- statistical analysis;
- updating and enhancing client records and managing client relationships, for example:
 - analysis to help us manage our practice (including requests to partake in surveys) and data analytics to improve our website, products/services, marketing, customer relationships and experiences;
 - staff administration and assessments, monitoring staff conduct, disciplinary matters;
 - credit reference checks via external credit reference agencies;
 - marketing our own products and services to you (where appropriate);
 - to keep your information and marketing preferences accurate;
 - to pursue available remedies or limit any damages that we may sustain.

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 information, for example regarding 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:
 - ✓ enquire about our services;
 - ✓ attend a meeting or event hosted by us;
 - ✓ subscribe to our service or publications;
 - ✓ request marketing to be sent to you;
 - ✓ enter a competition, promotion or survey; or
 - ✓ give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see "Cookies" below for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - client data and status verification services such as Vistra, LEM Verify, the Electoral Roll, from your other professional advisers;

- Technical Data from the following parties:

analytics providers such as Google based outside the UK;

advertising networks such as LinkedIn and Google inside or outside the UK]; and

search information providers based inside 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.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in “How We Use Your Personal Data” above.

- Between members of the Group.
- External Third Parties such as suppliers and those we liaise with and/or instruct on your behalf.
- 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 privacy notice.
- We will share personal information with law enforcement agencies if required by applicable law.

We require all Group members and other 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 and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

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.

We use the following cookies:

_utma (Google Analytics)
 _utmb (Google Analytics)
 _utmc (Google Analytics)
 _utmz (Google Analytics)

AdWords Conversion Code

Tag Manager

Call Conversion Code

We also utilise Hotjar to optimise this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the 'About Hotjar' section of Hotjar's support site.

These cookies are used to collect information about how visitors use our site, which we use to help improve it. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

To find out more about cookies, including how to see which cookies have been set and how to manage and delete them, visit www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>

LEGAL REASONS WE COLLECT AND USE YOUR PERSONAL INFORMATION

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 lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Further details about these lawful bases can be found in the Glossary below the table.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us 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 on-board you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with legal obligations

For the provision of legal services (and other services provided by us) to you, including: (a) Managing payments, fees and charges (b) Collecting and recovering 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) (c) Necessary to comply with legal obligations
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (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 customers use our products/services)
To enable you to partake in a prize draw, competition or 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 customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including, insurance, audits, accreditations, HR functions, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(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 legal obligations
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
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	Necessary for our legitimate interests (to develop our products/services and grow our business)

	(e) Profile (f) Marketing and Communications	
To process applications for insurance	(a) Identity (b) Contact (c) Profile (d) Financial	(a) Necessary to comply with legal obligations (b) Necessary for our legitimate interests (to keep our records updated)
When lawful, to administer our Client Relationship Manager system	a) Identity (b) Contact (c) Profile (d) Transactional history (e) Marketing and Communications	Necessary for our legitimate interests (to develop our business, maintain client relationships and keep contact and identity data and marketing preferences accurate)

GLOSSARY OF LAWFUL BASES

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 us.

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 obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

TRANSFER OF YOUR INFORMATION OUTSIDE THE UNITED KINGDOM (UK)

It may be necessary to transfer your personal information outside the UK or to an international organisation in order to receive support from a supplier.

Whenever we transfer your personal data out of the UK, 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 personal 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 contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

If you would like any further information, please contact us *via* risk@shma.co.uk

HOW LONG WILL WE STORE YOUR PERSONAL DATA?

We retain data for the periods stated in our Document Retention Policy. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

CONSENT

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

YOUR 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:

- 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.
- 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 want more information about your rights under the UK GDPR, please see the Guidance from the Information Commissioners Office on [Individual's rights under the GDPR](#).

If you want to exercise any of these rights, please contact the Risk Team at risk@shma.co.uk or via 0121 214 0000 or by letter to the Risk Team, Shakespeare Martineau LLP, 1 Colmore Square, Birmingham, B4 6AA. The Risk Team is the point of contact, for the purpose of this notice, for all entities within the Group.

You will not usually have to pay a fee to access your personal 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 could refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

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.

OUR 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.

HOW TO MAKE A COMPLAINT

If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority, or seek redress through the courts. The UK supervisory authority is the Information Commissioner's Office who can be contacted by calling 0303 123 1113.

FUTURE PROCESSING

We do not intend to process your personal information for any reason other than stated within this privacy notice. If this changes, we will update this notice.

CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 4th May 2021

We constantly review our internal privacy practices and may change this notice from time to time.

GET IN TOUCH

If you have any questions about this privacy notice or the information any member of the Group holds about you, please contact the Risk Team at risk@shma.co.uk or via 0121 214 0000 or by letter to the Risk Team, Shakespeare Martineau LLP, 1 Colmore Square, Birmingham, B4 6AA. The Risk Team is the point of contact, for the purpose of this notice, for all entities within the Group.

ALTERNATIVE FORMATS

If it would be helpful to have this notice provided in another format please contact us (see 'Get in touch' above).