

Privacy Notice

De Pinna Notaries is the trading name of De Pinna LLP (also referred to as “De Pinna”, “we”, “our”, “ours” or “us”), a limited liability partnership registered in England and Wales with number OC421725 and with registered office at Southwest House, 11a Regent Street St. James's, London SW1Y 4LR, England.

Our telephone number is +44 (0)20 7208 2900.

Our website is www.depinna.com.

Our general enquiry email is info@depinna.co.uk.

Our VAT registration number is GB 243 2744 74.

References in this Privacy Notice to “you” or “your” are references to individuals whose personal data we process in connection with services we provide. For the avoidance of doubt, any reference to our “clients” or “suppliers” includes their employees or other staff whose personal details we process.

In this Privacy Notice the term "Data Protection Laws" means:

- (a) the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"),
- (b) the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and
- (c) any legislation ratifying or otherwise adopting or replacing the above, or any applicable associated or supplementary data protection laws or regulations, and any binding codes of conduct or guideline adopted by the Information Commissioner's Office, each as updated, amended or replaced from time to time.

We are committed to lawful, fair and transparent processing of all personal information about our clients, suppliers and other third parties at all times in accordance with applicable data protection laws.

1. Purpose of this Privacy Notice

This Privacy Notice explains how we handle and treat your data when you:

- (i) visit our website, www.depinna.com (“our Website”), including filling out the contact form that appears on our Website, or
- (ii) engage with us to use the notarisation, legalisation or translation services that we provide (our "Services"), including any personal data you provide to us relating to anyone else.

It also includes information about individuals whose personal information we may process as a result of providing the Services to you.

2. Changes to this Privacy Notice

We are continually improving our data protection policies and procedures, and as a result this Privacy Notice will change from time to time. If we change our

Privacy Notice, we will update it by posting a new version on our Website and/or, if we so choose, by contacting you directly. Your continued use of our Website, content or services, or your continued dealing with us will amount to your acknowledgement of the amended privacy policy.

3. Contact

Questions, comments and requests regarding this privacy policy are welcome and should be addressed to compliance@depinna.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office, so please contact us in the first instance.

4. Compliance Officer

Our Compliance Officer is responsible for ensuring De Pinna's compliance with Data Protection under Data Protection Laws and this policy. The Compliance Officer may be contacted at:

compliance@depinna.co.uk

or by post at:

Compliance Officer, De Pinna LLP, Southwest House, 11a Regent Street St. James's, London SW1Y 4LR, London W1J 0LJ

5. The personal data we collect about you

Personal data includes any information about an individual from which that person can be identified. It does not include personal data where the identity has been removed (anonymous data).

Special categories of personal data include details about 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. As part of providing notarial services to you, we may collect special categories of personal data about you and/or about your criminal convictions and offences. Please see below for details of these circumstances.

We collect, use, store and transfer different kinds of personal data about you. We have grouped together the following categories of personal data to explain how this type of information is used by us. These terms are used throughout this Privacy Notice:

- "Identity Data": including your first name, middle name(s), maiden name(s), family name(s), marital status, title, date of birth, passport number, photographic identification and gender;
- "Contact Data": including your billing address, delivery address, email address and telephone number;
- "Financial Data": including your bank account and payment card details;

- “Services Data”: including details about payments from you and other details of services you have purchased from us;
- “Usage Data”: includes information about your use of our website, our local area networking facilities (including Wi-Fi) and similar electronic services;
- “Technical Data”: includes information collected when you access our website, your internet protocol (IP) address, your 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 are using;
- “Marketing and Communications Data”: including your marketing and communication preferences. We also track when you receive and read marketing communications from us and which of our events you attend. We use this information to improve our marketing services, provide you with more relevant information and improve the quality of our marketing materials. Additional information about the personal data we process in connection with marketing is included in the marketing communications we send you;
- “Professional Information”: including your job title, email address, phone number and addresses;
- "CCTV Data" including closed circuit television recordings for safety and security purposes;
- “Special Categories of Personal Data”: includes personal data listed above, which we process where required to do so for legal or regulatory purposes, or where you have provided us with such information as it is necessary for a specific service we are providing to you. We may process this personal data, for example:
 - (i) for legal and regulatory purposes, for example, we may need to verify whether you are a politically exposed person;
 - (ii) when establishing your requirements for the administration of an oath; or
 - (iii) we may ask you for your dietary requirements if we are arranging catering for you.

Our services may relate to children. We may process children’s personal data when we act for you in relation to certain notarisation and translation services. We will process children's personal data only where necessary for the specific Services we are providing. In such cases, we act on behalf of the parent or guardian.

6. What information we collect and from whom

We may collect personal information from you in the course of our business, including through your use of our Website, when you contact or request

information from us, when you engage our Services, or as a result of your working or personal relationship with one or more of our employees or clients.

We may process the following personal information:

- **If you are an individual client in receipt of our Services or prospective individual client, or if you are a supplier:**
 - Identity Data
 - Contact Data
 - Financial Data
 - Services Data
 - Marketing and Communications Data
 - Professional Information
 - CCTV Data, if you visit our offices
 - Relevant information as required by Know Your Client and/or Anti-Money Laundering regulations and as part of our client onboarding procedures. This may include evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with you, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from you or through the use of online sources or both.
 - Information you provide to us for the purposes of attending meetings and events, including dietary requirements which may reveal information about your health or religious beliefs.

We are frequently engaged by corporate entities and, as such, those instructors are not data subjects. However, as part of such instructions, personal information may be provided to us (e.g. personal information relating to officers or personnel of our corporate clients). Please see further information in Section 16 below.

If you are an individual whose personal information is processed by us as a result of providing the Services to others (including individual clients and corporate clients) we will process a variety of different personal information depending on the Services provided.

We might also need to process personal information in relation to other third parties who are instructed either by our own clients, or other persons or companies involved with us providing the Services to our clients (e.g. other law firms, experts etc.).

This is a non-exhaustive list which is reflective of the varied nature of the personal information processed as part of us providing notarisational, legalisation or translation services.

For clients and prospective clients, we also collect information to enable us to market our products and Services which may be of interest to you. For this purpose, we collect:

- Identity Data

- Contact Data
- Marketing and Communications Data
- Professional Information
- Areas or topics that interest you
- Additional information may be collected such as events you attend and, if you provide it to us, dietary preferences which may indicate data about your health or religious beliefs
- **If you are a visitor to our Website:**
 - Identity Data
 - Contact Data
 - Usage Data
 - Technical Data
 - Marketing and Communications Data
 - Professional Information, if provided
 - Other information relevant to your usage of our Website

7. How we will use your personal data and our legal basis

We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data. Please contact us at compliance@depinna.co.uk if you need details about the specific legal basis that we are relying on to process your personal data where more than one ground has been set out in the table below.

8. In relation to our client services:

| | |
|----------------------------|--|
| Purpose and/or activity | If you are our actual or prospective client, to check whether we would not be legally permitted to act for you. |
| Legal basis for processing | <ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation • Legitimate interests: ensuring we (and all other parties concerned) understand any issue of independence and/or impartiality which may arise for us in a matter |

| | |
|----------------------------|--|
| Purpose and/or activity | To take you on as a new client, including performing anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks. |
| Legal basis for processing | <ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation |

| | |
|--|--|
| | <ul style="list-style-type: none"> • Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities, e.g. terrorism • Public interest |
|--|--|

| | |
|----------------------------|--|
| Purpose and/or activity | To manage payments, fees and charges and to collect and recover money owed to us. |
| Legal basis for processing | <ul style="list-style-type: none"> • Performance of a contract • Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us |

| | |
|----------------------------|---|
| Purpose and/or activity | To manage our relationship with you which will include notifying you about changes to our Terms of Business or this Privacy Notice. |
| Legal basis for processing | <ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation • Legitimate interests: ensuring we can notify you about changes to our Terms of Business or this Privacy Notice |

| | |
|----------------------------|--|
| Purpose and/or activity | To interact with governmental or regulatory bodies or other authorities in relation to you |
| Legal basis for processing | <ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation • Public interest |

| | |
|----------------------------|---|
| Purpose and/or activity | To manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities. |
| Legal basis for processing | <ul style="list-style-type: none"> • Legal or regulatory obligation • Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security, fraud prevention |

| | |
|--|--|
| | and improving or reorganising our infrastructure |
|--|--|

| | |
|----------------------------|---|
| Purpose and/or activity | To send you marketing (including paper and electronic marketing communications) or to contact you by other means to offer you our client services. |
| Legal basis for processing | <ul style="list-style-type: none"> • Legitimate interests: promoting our client services and identifying ways to grow our business • Consent (where applicable) |

9. In relation to visitors of our Website:

| | |
|----------------------------|---|
| Purpose and/or activity | <p>We analyse your contact details with other personal information that we observe about you from your interactions with our Website, our email communications to you, and/or with our Services such as the Services you have viewed. For example, we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Website, or from your mobile.</p> <p>This includes the following:</p> <ul style="list-style-type: none"> • an IP address to monitor Website traffic and volume; • a session ID to track usage statistics on our Website; • information regarding your personal or professional interests, demographics, experiences with our products and contact preferences. <p>Our web pages contain "cookies", "web beacons" or "pixel tags" ("Tags"). Tags allow us to track receipt of an email to you, to count users that have visited a web page or opened an email and collect other types of aggregate information. Once you click on an email that contains a Tag, your contact information may subsequently be cross-referenced to the source email and the relevant Tag. Please see our Cookie Policy for further information.</p> |
| Legal basis for processing | <ul style="list-style-type: none"> • Consent |

10. In relation to supplier services:

| | |
|----------------------------|--|
| Purpose and/or activity | To check whether we would have a conflict of interest in appointing you as a supplier. |
| Legal basis for processing | <ul style="list-style-type: none"> • Legal or regulatory obligation • Legitimate interests: ensuring we understand any conflict of interest which may arise for us |

| | |
|----------------------------|---|
| Purpose and/or activity | To take you on as a new supplier including performing anti-money laundering, anti-terrorism, sanctions, fraud and other background checks. |
| Legal basis for processing | <ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation • Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities for example terrorism • Public interest |

| | |
|----------------------------|--|
| Purpose and/or activity | To manage payments, fees and charges and to collect and recover money owed to us. |
| Legal basis for processing | <ul style="list-style-type: none"> • Performance of a contract • Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us |

| | |
|----------------------------|---|
| Purpose and/or activity | Where we provide you with access to our systems, we need to manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, and data hosting. |
| Legal basis for processing | <ul style="list-style-type: none"> • Legal or regulatory obligation • Legitimate interests: ensuring the efficient and secure running of our business, including maintaining information technology services, network and data security |

11. **With whom we share your personal information**

We may share your personal data with the following categories of third parties as necessary and subject to our professional obligations and our Terms of Business, which can be found on our Website at www.depinna.com/de-pinna-terms-of-business:

- our professional advisers or consultants, such as lawyers and accountants,
- governmental, taxation or other regulatory authorities (for example, the Faculty Office), law enforcement agencies or any similar body,
- professional indemnity or other relevant insurers,
- third parties to whom we outsource certain services such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers,
- third parties engaged in the course of the Services we provide such as counsel, arbitrators, mediators, clerks, witnesses, cost draftsmen, court, opposing party and their lawyers, document review platforms and experts such as tax advisors or valuers,
- third party service providers to assist us with client insight analytics, such as Google Analytics, and
- third party postal or courier providers who assist us in delivering our postal marketing campaigns to you, or delivering documents related to a matter.

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide the Services as effectively as we can.

We require any person or entity to whom we disclose personal data pursuant to this Section to respect the confidentiality and security of your personal data and to treat it in accordance with applicable laws and regulations.

12. **International transfers**

In some cases, the parties we use to process personal data on our behalf are based outside the EEA, therefore their processing of your personal data will involve a transfer of such data outside the EEA. Similarly, in the course of advising clients based outside of the EEA, we may be required to share matter-relevant personal data with them. Where this is the case, we will only share the minimal amount of personal data necessary for the purpose of processing and, where possible, we will share the personal data in an anonymised form.

Whenever we transfer your personal 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 personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission,

- where we use certain service providers, we may use specific contracts approved by the European Commission which afford the same protection as within the EEA, and
- where we use providers based in the US, we may transfer personal data to them if they are certified under the EU-US Privacy Shield which requires certified providers to have in place and maintain a similar level of protection to the personal data as if it was processed within the EEA.

Please contact us at compliance@depinna.co.uk if you would like further information about the specific mechanism used by us when transferring your personal data out of the EEA.

13. **Data security**

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing, including:

- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

We ensure that those who have permanent or regular access to personal data, or that are involved in the processing of personal data, or in the development of tools used to process personal data, are trained and informed of their rights and responsibilities when processing personal data and are bound by confidentiality undertakings.

Our Information Security policy is based on the ISO27001 accreditation and our main information storage is on third-party servers based in the United Kingdom. We carry out secure destruction of paper and electronic media that is no longer needed using an accredited disposal company.

14. **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. This includes for example the purposes of satisfying any legal, regulatory, accounting, reporting requirements, to carry out notarial work, or for the establishment or defence of legal claims.

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.

If you would like to know more about the retention periods we apply to your personal data, please contact us at compliance@depinna.co.uk.

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.

15. Your rights

You have the following rights in relation to the personal information we hold about you:

15.1 Your right of access

If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

15.2 Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If we have disclosed the relevant personal data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible.

15.3 Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

15.4 Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us processing your personal data. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where reasonable.

15.5 Your right to data portability

You have the right, in certain circumstances, to obtain in a structured, commonly used and machine readable format the personal information you've provided us with, and to reuse it elsewhere, or to ask us to transfer this to a third party of your choice.

15.6 Your right to object

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing purposes.

15.7 Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

15.8 Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant Supervisory Authority.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data, or where data may be exempt from disclosure.

You may exercise any of your rights by contacting us at compliance@depinna.co.uk. You will not normally have to pay a fee to exercise any of these 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.

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 expedite our response.

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar 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.

16. **How we use personal data relating to other individuals collected from you**

On certain occasions, in the course of our Services, if you provide us with personal data of individuals who are not aware of our involvement or of our processing of their personal data (*e.g.* personal data of employees), we are likely to not have direct contact with individuals whose personal data we are processing, or it may for other reasons (for instance, to maintain confidentiality) not be appropriate for us to provide them with a privacy notice setting out how we process their personal data. Before you pass any such personal data to us, you must therefore ensure that the relevant individuals have received any requisite privacy notices in connection with the performance of our Services.

17. **Processing your personal data if you are not our client**

If you are not our client, we may need to process your personal data in order to provide our Services to our client. We will process your personal data in these circumstances as:

- this is in our legitimate interests, our client's legitimate interests or those of another third party; and/or
- we may be required to process that personal data to comply with our legal or regulatory obligations.

If you have any questions about how we will process your personal data, please contact us at compliance@depinna.co.uk.