

WGS'S POLICY ON THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION ("PRIVACY POLICY")

1. Introduction

This Privacy Policy sets out the basis upon which any personal data we collect from you, or that you provide to us, may be processed by (or on behalf of) WGS. Personal data collected or provided via any means, for example our Website, meetings with and emails and telephone calls with us is covered by this Privacy Policy unless we expressly state otherwise in writing.

WGS takes the protection of all Personal data seriously. Our obligations as legal professionals are governed, in part, by rules of professional conduct which impose duties and obligations regarding the confidentiality of the information provided to WGS by its clients. Moreover in the UK the rules as set out in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) apply.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By providing your personal data to WGS, you will be deemed to have consented to the processing of such data by us as set out in this Privacy Policy. If you do not agree with use of your personal data as set out in this Privacy Policy you should not submit your personal information to us.

2. What information do we collect?

As a general rule, all information concerning the business and affairs of a person or organization acquired: (1) for the purpose of determining whether WGS will enter into a professional relationship; or (2) in the course of a professional relationship, shall be held in strict confidence and not revealed to anyone unless expressly or implicitly authorized by the person or organization concerned or permitted or required by applicable law. A professional relationship develops when WGS agrees to be retained to provide services to an individual or organization.

In the course of its relationship with you, WGS will need to collect, use, and sometimes, disclose various types of Personal data for purposes associated with the scope of the services we provide as directed by you or your organization. Given the complexity of our work, it is impractical to list all of types of Personal data that may be collected, used or disclosed. However, the Personal data we collect may include:

- your full name;
- contact information, such as your address, telephone number, e-mail address, or job titles;
- information regarding your legal requirements, situation, and interests;
- whether you have subscribed or unsubscribed from any our mailing lists, or accepted any of our invitations;
- information regarding your organization or other organizations, including information regarding directors, officers, or employees of our clients or other parties, witnesses, beneficiaries, adverse parties, related parties, parties in interest, business partners, investors, shareholders, security holders, buyers, business partners, and customers of clients;
- your payment information; and
- any other Personal Data that you voluntarily choose to provide to us.

3. How do we use and disclose personal information?

WGS only uses and discloses personal information for the purposes set out in this Privacy Policy. Under no circumstances will WGS sell, trade, barter or exchange for consideration any Personal data it has obtained.

WGS may use and disclose Personal data for the following purposes:

- Establishing your identity and compliance with "Know Your Client" regulations and other legal obligations (for example anti-money laundering regulations and obligations pursuant to financial and tax obligations): which may require you to provide name, address, employment/business information, and/or other legally mandated forms of identification; this information may be needed not only for WGS but also by firms or government bodies with whom we are working, i.e. other solicitors or estate agents or accountants or HMRC
- Billing: which will include the collection of names, addresses, banking and/or financial details;
- Provision and development of Services/Products: which will include any Personal Data necessary to provide services requested by you or your organization;
- Internal record keeping;
- Answering your queries, and/or providing you with information or materials you have asked to receive;
- To keep your information and preferences accurate. For example, from time to time, we may ask you (by email or otherwise) to review your contact details and any mailing list preferences and update them as necessary;
- To permit WGS to pursue available remedies or limit any damages that WGS may sustain;
- Any purpose which is permitted or required by applicable law; and
- To carry out any other purpose which is disclosed to you and to which you consent.
- providing legal advice to you;
- communicating with you by telephone, text, email and/or post (in accordance with your opt-in preferences) about WGS's activities, and events;
- communicating with you by telephone, text, email and/or post (in accordance with your opt-in preferences) about the activities, and events of organisations that are linked to WGS or to whom we are obliged or required to disclose data;
- if you have given the consent implied by these conditions, we may provide the personal data that we hold about you to appropriate third parties; and
- as otherwise outlined at the time of collection of your personal data in accordance with the preferences that you express.
- If you apply to WGS for a job, internship and/or work placement online you may need to provide all and/or any of the following: information about your education, employment, racial background and state of health. Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out the monitoring activities required of us as an equal opportunities employer.

4. How long will you keep my personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the 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 requirement.

If you have particular concerns about your information please contact us.

5. Changing your preferences

We want to make sure that you are happy with the ways in which we hold and use your personal data. If at any time you wish to check, update or amend your personal data or preferences, please contact the fee earner who is handling your case us by email and also swp@wgs.co.uk

In general, you can use our website without giving WGS any Personal data. If you are one of our anonymous visitors, please bear in mind that we may still record certain analytical information and as further set out in this section.

6. Consent

Your provision of Personal data to WGS means that you agree and consent that we may collect, use and disclose your Personal data in accordance with this Privacy Policy. If you do not agree with these terms, please do not provide any Personal Data to WGS. But please note that certain services can only be offered if you provide Personal Data to WGS, but other information may be optional. If you choose not to provide us with any required Personal Data, we may not be able to offer you certain services.

Consent may be given in different ways such as: a) expressly by signing a document, agreeing through electronic means or verbally; or b) implicitly by providing the Personal Data voluntarily.

There may be circumstances where you have provided Personal Data for an identified purpose, and WGS later needs to use that information for a different purpose. In such circumstances, WGS will seek your consent to use the information for the new purpose.

You have the right to revoke your consent to the collection, use and disclosure of your Personal Information at any time. However, revocation of your consent may result in our inability to provide services to you. We will discuss with you the reason we need your Personal Data and why the revocation of your consent affects our ability to provide the service or product to you.

Please note that there are circumstances where the use and/or disclosure of Personal Data may be justified or permitted or where WGS may or must disclose information without consent, in accordance with the applicable law.

Where obliged or permitted to disclose information without consent, WGS will not disclose more information than is required for the purpose that obligates or permits us to disclose such information

7. Changes to Privacy Policy and queries

This Privacy Policy was last updated on 28 August 2018. WGS reserves the right to vary this Privacy Policy from time to time. Such variations become effective immediately upon the posting of the varied Privacy Policy on our Website. By continuing to use the Website you will be deemed to accept such variations.

If you have any queries about this Privacy Policy or any queries about the protection of personal data we hold about you, please do not hesitate to contact us at WGS Solicitors , 133 Praed Street, London W2 1RN email swp@wgs.co.uk].

8. Access to your personal data

As a data subject, you have the following rights under the Data Protection Laws:

If you are in the EEA:

- the right of access to Personal Data relating to you;
- the right to correct any mistakes in your information;
- the right to ask us to stop contacting you;
- rights in relation to automated decision making;
- the right to restrict or prevent your Personal Data being processed;
- the right to have your Personal Data ported to another data controller (e.g. if you decide to contract with a different service provider); and
- the right to erasure.

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Legislation.

To help us find the Personal Data easily, please provide us as much information as possible about the type of Personal Data you would like to see. You can require us to correct any mistakes in your Personal Data which we hold free of charge. You may request that we stop processing your personal data temporarily if:

- you do not think that your Personal Data is accurate. We will start processing again once we have checked whether or not it is accurate;
- the processing is unlawful but you do not want us to erase your Personal Data;
- we no longer need the Personal Data for our processing, but you need the Personal Data to establish, exercise or defend legal claims; or
- you have objected to processing because you believe that your interests should override our legitimate interests.

You may ask for an electronic copy for such of your Personal Data which we may hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.

You can ask us to erase your Personal Data where:

- you do not believe that we need your Personal Data in order to process it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your Personal Data, you withdraw that consent and we cannot otherwise legally process your Personal Data;
- you object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or
- your Personal Data has been processed unlawfully or have not been erased when it should have been.

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have processed your Personal Data in accordance with this notice - you should let us know as soon as possible. Similarly, you may complain to the competent supervisory authority being <https://ico.org.uk>

WGS Solicitors

133 Praed Street,

London W2 1RN

AUGUST 2018