

Privacy Policy

This privacy policy sets out how Sutton-McGough Solutions Limited uses and protects any information that you give when you use this website.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Sutton-McGough Solutions Limited may occasionally change this policy by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

Date of Policy:	Effective from 1 st September 2022
Reviewed by:	James McGough
Next Review due by:	1 st September 2023



Contact details

Full name of legal entity: Sutton-McGough Solutions Ltd.
Name of data privacy manager: Dr, Julia Sutton-McGough
Email address: admin@sutton-mcgough.co.uk

What we collect

We may collect the following information if you contact us through the 'Contact' page:

- Name
- Contact information including phone or email address
- Other information such as your business or organisation name and any details you provide via the message box on the 'Contact' page.

How we collect your personal data

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 collect data about you through a variety of different methods including:

Direct interactions: You may provide data by filling in forms on our site, by communicating with us by post, phone, email or otherwise, including when you:

- Enquire about our services;
- Engage our services;
- Give us feedback.

Automated technologies or interactions.

As you interact with our website, we may 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.

How we use your personal data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override these interests.
- Where we need to comply with a legal or regulatory obligation

How long we will keep your data

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 or reporting requirements.

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.



<u>Purpose / Activity</u>	<u>Type of data</u>	<u>Lawful basis for processing</u>
To register you as a new client	(a) Identify (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To process and deliver our services to you including: (a) Manage payments (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave feedback 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 deliver relevant content 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 site 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 (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business



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. In this case, we may have to cancel a service you with us, but we will notify you if this is the case at the time.

Sutton-McGough Solutions Ltd. processes personal data about the following categories of people:

- Clients
- Potential Clients
- Other people involved in client matters we are acting on
- Referrers of work
- Other third parties (including our staff/Associates) we have business relationships with.

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.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

Disclosures of your personal data

When we process and use the personal data of our clients, potential clients, and other business contacts, we may need to share that personal data with other parties, including:

- Suppliers and service providers used by us in providing our services to you, including case management and document storage systems, identity verification service providers, client relationship management service providers, IT service providers (including cloud-based providers of software services) and data room providers.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

Security

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that Sutton-McGough Solutions Limited do not have any control over the other website.



Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Your legal rights, including how to withdraw your consent

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data or request that we transfer a copy of your personal information to another party, please contact Julia Sutton-McGough in writing.

You will not 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 may refuse to comply with your request in these circumstances.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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.

We try to respond to all legitimate requests 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us (Sutton-McGough Solutions Limited) first if you do have a complaint so that we can try to resolve it for you.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Thank you for taking the time to read this policy.

