

Please read the following information carefully. This Privacy Notice details what personal data we collect and process and how we shall use it.

## **About Us**

Your personal data is held by Cyber Security Strategies (trading as CSS Assure) which is part of the Ampa group. We are a leading group of legal and professional service brands. The Ampa group is comprised of the following entities/associated entities:

- Ampa Holdings LLP
- Shakespeare Martineau LLP
- Shakespeare Martineau Scotland LLP
- Cyber Security Strategies Limited
- Coadax LLP

Cyber Security Strategies (trading as CSS Assure) is a limited liability partnership registered in England and Wales with number 11070817. Its registered office is No 1 Colmore Square, Birmingham, United Kingdom, B4 6AA.

## **Our Privacy Commitments**

We are proud of our reputation for acting fairly, ethically and with integrity wherever we do business. Our reputation is built on our values as a company and the values of our employees, members and other partners who support us. As a group we are committed to our values, which guide us and reflect who we are: **authentic, collaborative, trusted, brave.**

Privacy and Data Protection are fundamental human rights. By aligning our use of people's data with our group values, we are able to champion and respect every individual's right to privacy and data protection, and to process your data in a way that is fair and lawful.

## **Contact Us**

If you have any questions about this privacy notice or the information any member of the Group holds about you, please contact our Data Protection Officer at [dpo@ampa.co.uk](mailto:dpo@ampa.co.uk) or via 0121 214 0000 or by letter to the Data Protection Officer, Ampa Holdings LLP, 1 Colmore Square, Birmingham, B4 6AA.

If it would be helpful to have this notice provided in another format, please let us know.

## **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 or by visiting their website at <https://ico.org.uk/for-the-public>.

## **Changes to this Privacy Notice**

We continually review our Privacy Notice and update it where necessary. We advise that you regularly check our Privacy Notice for updates. We do not wish to bother you with lots of minor amendments, but where we make significant changes to our policy, we may contact you to inform you.

## **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 in certain circumstances. 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 in certain circumstances, including where we are processing your personal data for direct marketing purposes.
- **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 in certain circumstances. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. 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 by visiting <https://ico.org.uk/for-the-public>.

If you want to exercise any of these rights, please contact our Data Protection Officer at [dpo@ampa.co.uk](mailto:dpo@ampa.co.uk) or via 0121 214 0000 or by letter to the Data Protection Officer, Ampa Holdings LLP, 1 Colmore Square, Birmingham, B4 6AA.

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.

## **Keeping Your Data Secure**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used/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 for specified purposes, 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 Long Will We Store Your Personal Data?**

We maintain retention schedules which define the periods for which we will store your personal data. We will only store personal data for as long as we have a legitimate need to retain it, either for statutory/legal reasons or because we need the data to be able to provide you with services or for other legitimate business needs.

When we no longer need this information, we will anonymise your data and/or dispose of it securely. A copy of our retention schedule is available by request to the DPO.

## **Transfer of Your Information Outside of the United Kingdom**

It may be necessary to transfer your personal data outside the UK.

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 [dpo@ampa.co.uk](mailto:dpo@ampa.co.uk).

## **Automated decision-making.**

Automated decision-making is the process of making a decision by automated means without any human involvement. We do not currently process your personal data in this manner.

## **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 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.

## **The Data We Collect About You**

Personal data is 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 process different kinds of personal data about you 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 transfers 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 us or otherwise provided by you.
- **Information Relevant to the provision of services** including any personal data relevant to a transaction or any professional advice given to you.
- **Technical Data** includes internet protocol (IP) address, 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.
- **Sensitive Personal Data:** during the work we do for you, we may have to process 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 process health and religious data for the purposes of access facilitation or for dietary requirements.
- We also process **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.

#### **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 that 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.
- Where we have your consent to do so.

We have set out below, in a table format, a description of all the ways we use your personal data, and which of the GDPR lawful bases we rely on to do so.

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.

Purpose/Activity	Lawful basis for processing
To on-board new clients	<ul style="list-style-type: none"> <li>• Performance of a contract with you.</li> <li>• Necessary to comply with legal obligations.</li> </ul>
Provision of our services to our clients	<ul style="list-style-type: none"> <li>• Performance of a contract with you.</li> <li>• Necessary for our legitimate interests.</li> <li>• Necessary to comply with legal obligations.</li> </ul>
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy notice;</li> <li>• Asking you to leave a review or take a survey;</li> <li>• Managing payments, fees, and charges;</li> <li>• Collecting and recovering money owed to us.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you.</li> <li>• Necessary to comply with a legal obligation.</li> <li>• Necessary for our legitimate interests.</li> </ul>
To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> <li>• Performance of a contract with you.</li> <li>• Necessary for our legitimate interests.</li> </ul>
To administer our businesses (including, insurance, audits, accreditations, website management, troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data, recording transactions, quality control, administration of our Client Relationship Management system).	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> <li>• Necessary to comply with legal obligations.</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> </ul>

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> </ul>
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> </ul>
To pass your contact details to other Ampa group entities or associate entities to allow them to provide services directly to you.	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
For compliance with legal and/or regulatory obligations and good practice, e.g. completing conflict of interest checks (where applicable), 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;	<ul style="list-style-type: none"> <li>• Necessary to comply with legal obligations.</li> </ul>
To conduct credit reference checks via external credit reference agencies;	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> <li>• Necessary to comply with legal obligations.</li> </ul>

## 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 to which we are subject.

**Consent** means that you have provided us with a freely given, specific, informed and unambiguous indication of your agreement to the processing of personal data.

## Sharing Your Personal Data

We may share your personal data with the parties set out below:

- With other Ampa group entities and associate entities for administrative, technical, and management purposes, or if such entity is providing products or services to the group. The current group entities and associate entities are:
  - Shakespeare Martineau LLP (trading as Corclaim, Lime Solicitors, Marrons, Mayo Wynne Baxter and Shakespeare Martineau)Shakespeare Martineau Scotland LLP
  - Coadax LLP
  - Cyber Security Strategies Ltd (trading as CSS Assure)
  - Ampa Holdings LLP
- Third Parties such as:
  - suppliers and those who process data on our behalf.
  - those 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.
- Any entity to whom we are legally required or requested to make such disclosure by any court of competent jurisdiction or by any governmental, law enforcement agency or other regulatory authority.

We require all Ampa 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.