

Privacy Notice

Who We Are

Name of company
LegalMentorCoUK Limited

Registered office
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London

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Company Registration no.
8249966

ICO Reference Number:
ZA090691

Purpose of this Privacy Notice

This privacy notice gives you information on how LegalMentorCoUK Limited collects and processes your personal data. Personal data refers to data which can uniquely identify a living individual. This data may be stored in multiple places, a combination of which may be required to uniquely identify the individual. It does not include data where the identity has been removed or replaced (anonymous/pseudonymised data).

LegalMentorCoUK Ltd is the controller and data processor and as such is responsible for your personal data. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details above.

You have the right to make a complaint at any time to the Information Commissioner's Office (www.ico.org.uk). However, we would appreciate the chance to deal with your concerns before contacting the ICO, so please contact us in the first instance.

Changes to this Privacy Notice, and your duty to inform us of changes

This version was last updated on 25th May 2018.

This privacy notice sets out most of your rights under the General Data Protection Regulation (GDPR).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Personal data that we collect

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- Identity data - e.g. names, titles, gender
- Contact data - e.g. invoice addresses, delivery addresses, e-mail addresses, telephone numbers
- Financial data - e.g. bank accounts
- Transactional data - e.g. orders, invoices, payments
- Technical data - e.g. IP addresses, usernames, passwords, operating systems, platforms
- Marketing and communications data - e.g. preferences in receiving marketing and news from us

We do not collect any special categories of personal data about you (e.g. details about your race, ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, health data, biometric data), nor do we collect information about criminal convictions and offences.

We do not collect any information about children other than names and ages.

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.

How we collect your personal data

We use different methods to collect data from and about you, including:

- Direct interaction
You may give us your identity, contact and financial data by filling in forms, or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:
 - request our products or services
 - create an account on our website
 - request marketing to be sent to you
 - enter a competition or survey
- Third parties or publicly available sources (see "Glossary" for details)
- Contact, financial and transaction data from providers of technical, payment and delivery services

How we process 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 or regulatory obligation

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to receiving marketing information at any time by contacting us.

Purposes for which we will use your personal data

Below is a description of each of the ways we plan to use your personal data, and which of the legal bases we rely upon to do so. We have also identified our legitimate interests where appropriate.

Note that we may process your personal data for more than one lawful ground 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 upon to process your personal data where more than one ground has been listed below.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> Identity Contact 	<ul style="list-style-type: none"> Performance of a contract with you
<p>To process and deliver your order, including:</p> <ul style="list-style-type: none"> Managing payments, fees and charges Collecting and recovering money owed to us 	<ul style="list-style-type: none"> Identity Contact Financial Transaction Marketing & Communications 	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
<p>To manage our relationship with you, including:</p> <ul style="list-style-type: none"> Notifying you about changes to our terms or privacy policy 	<ul style="list-style-type: none"> Identity Contact Marketing & Communications 	<ul style="list-style-type: none"> Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated)
<p>To administer and protect our business, including:</p> <ul style="list-style-type: none"> Troubleshooting Data analysis Testing System maintenance Support Reporting Hosting of data 	<ul style="list-style-type: none"> Identity Contact Technical 	<ul style="list-style-type: none"> 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) Necessary to comply with a legal obligation
<p>To deliver relevant content and advertisements to you, and to measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> Identity Contact Marketing and Communications Technical 	<ul style="list-style-type: none"> Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform of our marketing strategy)
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> Identity Contact Marketing and Communications Technical 	<ul style="list-style-type: none"> Necessary for our legitimate interests (to develop our products/services and grow our business)
<p>To deal with a general enquiry or careers enquiry</p>	<ul style="list-style-type: none"> Identity Contact 	<ul style="list-style-type: none"> Consent Necessary for our legitimate interests (recruitment and to communicate with our customers, partners and other third parties)

Marketing

We aim to provide you with choices regarding certain personal data use, particularly around marketing and advertising:

- **Promotional offers from us**
We may use your identity, contact, and technical data to form a view on what we think may be of interest to you. This is how we decide which products, services and offers may be relevant to you. You will receive marketing communications from us if you have requested information from us, or purchased goods and services from us, or if you provided us with your details when you entered a competition or registered for a promotion, and, in each case, you have not opted out of receiving that marketing.
- **Third-party marketing**
We will not share your personal data with any third-party for marketing purposes, without your consent.
- **Opting out**
You may ask us or third parties to stop sending your marketing communication at any time, by contacting us. Where you opt out of receiving marketing communication, this will not apply to other communication necessary for us to fulfil our contract with you.
- **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 you wish to get an explanation as to how the processing for the purpose is compatible with the original purpose, please contact us.
If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

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

- Internal third-parties
- External third-parties
- 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, the new owners may use your personal data in the same way as set out in this privacy notice.

We require all 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.

International transfers

On occasion, we share your personal data with third-party suppliers where required, and who are listed in our glossary. This may involve transferring your data outside of the European Economic Area (EEA).

We ensure your personal data is protected by requiring all our third-parties to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, see European Commission: Binding corporate rules.

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. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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.

Data retention

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, accounting, or reporting requirements.

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.

By law, we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers, for tax purposes.

In some circumstances you can ask us to remove your data: see "Your legal rights" below for further information.

In some circumstances, we may anonymise/pseudonymise 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.

Your legal rights

Under certain circumstances, you have rights under data protection laws relating to your personal data. Please contact us if you wish to exercise any of the rights listed below:

- Requesting access to your personal data
- Requesting correction of your personal data
- Requesting removal of your personal data
- Requesting restriction of the processing of your personal data
- Requesting transfer of your personal data
- Objecting to the processing of your personal data
- Withdrawing Consent

You will not usually have to pay a fee to access your personal data, or to exercise any of your other rights. However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee, or we may refuse to comply with your request.

For security reasons, we may need to request specific information from you in order to confirm your identity, and to ensure that you have rights to access your personal data, or to exercise any of your other rights. This is to ensure that your personal data is not disclosed to any person who has no right to receive it. We may also need to contact you for further information in relation to your request.

We aim to respond to all legitimate requests within one month, however it may take us longer if your request is particularly complex, or you have made a large number of requests. In this case, we will notify you and keep you updated.

Glossary

Third-parties

External third-parties

- Service providers acting as processors who provide IT and system administration services
- Professional advisors acting as processors or joint controllers, including lawyers, legal enforcement agencies, bankers, auditors and insurers, who provide consultancy, banking, legal, insurance and accounting services
- External third parties who provide electronic/computing services.