

WEBSITE PRIVACY POLICY

E J WINTER & SON LLP

1. General

This Privacy Policy sets out how we, E J Winter & Son LLP, obtain, store and use your personal information when you use or interact with our website, <https://www.ejwinter.co.uk>

Please note that if you enlist our services, both parties may enter into a separate agreement that will govern the processing of all information and data collected by our firm in connection with the service, including some data collected through our website. Such agreement takes precedence over any conflicting provision in this Privacy Policy.

This Privacy Policy is effective from 10th May 2018.

2. The information that we collect and where we get it from

We collect or obtain your information:

- when you provide it to us (e.g. by contacting us);
- from your use of our website via cookies (such as the type of browser you are using, the type of operating system you are using, and the domain name of your Internet service provider);
- and

We do not collect personally identifiable information about you unless you choose to fill out a form, found on many of the pages of the site or to email us directly.

The personal information that we process includes:

- basic information, such as your name (including name prefix or title), the company you work for, your title or position and your relationship to a person;
- contact information, such as your postal address, email address and phone number;
- Financial information, such as payment-related information;

- Identification and background information provided by you or collected as part of our business acceptance processes; and
- Any other information relating to you which you may provide to us.

We do automatically collect certain non-personally identifiable information when you visit our site – such as the type of browser you are using, the type of operating system you are using, and the domain name of your Internet service provider.

3. **How we use the information we collect**

We use non-personally identifiable information to analyse site usage (such as aggregated information on the pages visited by our users), which allows us to improve the design and content of our site.

We may do the following with your personal information:

- to respond to your inquiry or form you have completed on various sections of our Website;
- use it to provide legal services;
- use it to engage in marketing and business development activity in relation to our legal services. This may include sending you newsletters, legal updates, marketing communications and other information that may be of interest to you;
- to comply with legal and regulatory obligations that we have to discharge; and
- use it for our legitimate business interests, such as undertaking business research and analysis, managing the operation of our websites and our business.

4. **Grounds for using your personal information**

We rely on the following legal grounds to process your personal information, namely:

- **Consent**– we may (but usually do not) need you consent to use your personal information. You can withdraw your consent by contacting us (see below).
- **Performance of a contract**– we may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.
- **Legitimate interest**– we may use your personal information for our legitimate interests, some examples of which are given above.

- **Compliance with law or regulation**– we may use your personal information as necessary to comply with applicable law/regulation.

5. **How we share information with third parties**

We do not sell or rent your personal information to third-parties.

We may share your personal information with third parties, only to the extent necessary to run our business, provide a service to you, comply with the law, enforce our legal rights or because you have provided consent.

This may include the following.

- Third party agents/suppliers or contractors, in connection with the processing of your personal information for the purposes described in this Policy. This may include, but is not limited to, website hosting, IT and communications service providers.
- Third parties relevant to the services that we provide.
- To the extent required by law, regulation or court order, for example, if we are under a duty to disclose your personal information in order to comply with any legal obligation.
- Where it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process.

6. **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

7. **Website forms**

Any forms which are available on our website are powered by Jotforms also bound by the EU General Data Protection Regulations.

When you fill out a form, the data that you submit will be forwarded to Jotforms and will be collated into an email and sent to us.

The data that you submit via the form will not be stored within this website's own database or in any of our internal computer systems.

Your data will remain within Jotform's secure database in the EU for as long as we continue to use Jotform's services or until you specifically request removal by emailing us.

We consider JotForm to be a third party data processor. For more information, please see <https://www.jotform.com/privacy/>

8. Transferring your information outside of Europe

We may transfer your personal information outside of the European Economic Area.

If we do transfer your personal data outside the EEA:

- it will be because you have consented or because we have a legal reason to do so; and
- we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

9. 16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

10. Keeping your information and information security

How long we hold your personal information for will vary and will depend principally on:

- the purpose for which we are using your personal information – we will need to keep the information for as long as is necessary for the relevant purpose, and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.

We will ensure that the personal information that we hold is subject to appropriate security measures.

11. Cookies

A cookie is a piece of data stored on a user's hard drive containing information about the user. The information below explains the cookies we use on our website and why we use them:

- **Google Analytics cookies:** we use these cookies to collect information about how visitors use our website, including details of the site where the visitor has come from and the total number of times a visitor has been to our website. We use the information to improve our website and enhance the experience of its visitors.

You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at: www.allaboutcookies.org.

12. Your choices and rights

You have a number of legal rights in relation to the personal information that we hold about you and you can exercise your rights by contacting us using the details set out below.

These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information which we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information. In particular, information that is subject to legal professional privilege will not be disclosed other than to our client and as authorised by our client.
- Requesting that we correct your personal information if it is inaccurate or incomplete.

- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it.
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request.
- In some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transmit those information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us.
- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.
- Lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us. We can, on request, tell you which data protection authority is relevant to the processing of your personal information.

13. Changes to our privacy policy

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

14. How to contact us and other important information

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, please contact us. You can do this by writing to us at sols@ejwinter.co.uk.