

PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as “controller” of that personal information for the purposes of those laws.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	WLM Group, LLC
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

Personal Information We Collect About You

- Your name and contact information, including email address and telephone number and company details
- Your gender information, if you choose to give this to us
- Location data, if you choose to give this to us
- Your billing information, transaction and payment card information
- Information about how you use our website, IT, communication and other systems
- Your responses to surveys, competitions and promotions

This personal information is required to provide services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

How Your Personal Information is Collected

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website.

- From cookies on our website

How and Why We Use Your Personal Information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.,:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party –or–
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or WLM Group, LLC	For our legitimate interests or those of a third party, i.e., to minimise fraud that could be damaging for us and for you
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price

<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
<p>Statistical analysis to help us manage our business, e.g., in relation to our performance, customer base, product range or other efficiency measures</p>	<p>For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price.</p>
<p>Preventing unauthorised access and modifications to systems</p>	<p>For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations.</p>
<p>Updating and enhancing customer records</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products.</p>
<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.</p>

Marketing our services to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers
External audits and quality checks, e.g., for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

Promotional Communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never share it with other organisations outside the WLM Group, LLC group for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at will@lewislawgroupllc.com
- using the ‘unsubscribe’ link in emails or ‘STOP’ number in texts

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who We Share Your Personal Information With

We routinely share personal information with:

- Companies within the WLM Group, LLC group;
- Third parties we use to help deliver our services to you;
- Our insurers and brokers; and
- Our bank[s];

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to ISO accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Where Your Personal Information is Held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: “Who we share your personal information with”).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: “Transferring your personal information out of the EEA”.

How Long Your Personal Information Will Be Kept

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Transferring Your Personal Information Out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- With our offices outside the EEA;
- With your and our service providers located outside the EEA;
- If you are based outside the EEA;
- Where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

If you would like further information please contact us or our Data Protection Officer (see 'How to contact us' below).

Your Rights

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, e.g., processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- Email, call, or write to us or our Data Protection Officer —see below: “How to contact us”

–and–

- Let us have enough information to identify you (e.g., your full name, address and customer or matter reference number)
- Let us have proof of your identity and address (a copy of your driving licence or passport)
- Let us know what right you want to exercise and the information to which your request relates

Your Rights Under the CCPA. You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We Collect About You	You have the right to know: <ul style="list-style-type: none">• The categories of personal information we have collected about you;• The categories of sources from which the personal information is collected;• Our business or commercial purpose for collecting or selling personal information;• The categories of third parties with whom we share personal information, if any; and• The specific pieces of personal information we have collected about you.• Please note that we are not required to:<ul style="list-style-type: none">• Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
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	<ul style="list-style-type: none"> • Provide the personal information to you more than twice in a 12-month period.
<p>Personal Information Used for a Business Purpose</p>	<p>In connection with any personal information we may disclose to a third party for a business purpose, you have the right to know:</p> <p>The categories of personal information that we disclosed about you for a business purpose.</p> <p>You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the disclosure of your personal information. If you exercise your right to opt-out of the disclosure of your personal information, we will refrain from doing so, unless you subsequently provide express authorization for the same. To opt-out of the disclosure of your personal information, please email will@lewislawgroupllc.com.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records. • Please note that we may not delete your personal information if it is necessary to: • Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business

	<p>relationship with you, or otherwise perform a contract between you and us;</p> <ul style="list-style-type: none"> • Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; • Debug to identify and repair errors that impair existing intended functionality; • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; • Comply with the California Electronic Communications Privacy Act; • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; • Comply with an existing legal obligation; or • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Protection Against Discrimination	You have the right to not be discriminated against by us because you exercised any of

	<p>your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of services to you, if that difference is reasonably related to the value provided to our business by your personal information.</p>
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Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to Complain

We hope that we can resolve any query or concern you raise about our use of your information. Please email will@lewislawgroupplc.com with any concerns.

Changes to This Privacy Notice

This privacy notice was published on April 2, 2021 and last updated on April 2, 2021.

We may change this privacy notice from time to time – when we do we will inform you via Our Website

How to Contact Us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	
424 Woodland Way, Greenville, South Carolina 29607	
will@lewislawgroupllc.com	
615) 953 9422	