

PRIVACY NOTICE

Who are we?

1. We are abt Advocates & Notaries Public, a firm of advocates and notaries public based in the Bailiwick of Guernsey; all references to “we”, “us” or “our” in this Notice mean Ashton Barnes Tee.

What is this Privacy Notice?

2. This Privacy Notice (“**Notice**”) sets out the information we must provide to you under The Data Protection (Bailiwick of Guernsey) Law, 2017 (“**Law**”) in processing your personal information (“**PI**”) that you provide to us or we otherwise obtain in the course of operating our legal services business. For the purposes of the Law we are the data controller.

On what legal basis do we process your PI?

3. We process your PI principally for the purposes of performing a contract between you and us, and pursuing our legitimate interests, in providing legal services to you and operating our business, but if necessary we may separately rely on your explicit consent to use your PI which you may withdraw at any time. We may also process PI constituting special category data for the purposes of or in connection with legal proceedings or establishing, exercising or defending legal rights.

How do we obtain your PI?

4. We may obtain your PI from you when you communicate it to us directly via telephone, letter, email, or otherwise, we receive it from third parties, we obtain it from public sources, you interact with any marketing we undertake, and otherwise in the normal course of our business in providing legal services.

Why and for what purposes do we process your PI?

5. We process your PI in order to administer and operate our business in providing legal services to you and our clients, which includes for the purposes of complying with our legal and regulatory obligations, and processing and responding to enquiries, job applications and complaints we receive in the course of our business.

What PI do we process about you?

6. The PI we process varies depending on the work we undertake for you, but includes your names, addresses, telephone numbers, email addresses, date of birth, nationality, immigration status, residential status, family relationships, marital status, passport information, references, financial information, bank details, credit rating, sources of wealth, assets, professional and employment information, your education and qualifications, your directorships and shareholdings, information relating to claims, court cases and convictions, politically exposed person (PEP) status, information available in the public domain, social media account information, third party opinions and other information about you, the PI of persons connected to you whether professionally, personally or otherwise, and special category data relating to your health, medical details, criminal data, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data and data concerning your sex life or sexual orientation.

For what purposes may we share your PI?

7. We may need to share your PI with various third parties for the purposes of operating our business and providing legal services to you and our clients, in seeking references and confirmation of details you have provided to us, and otherwise to the extent required by law, regulation or court order.

With whom may we share your PI?

8. We may share your PI with third parties including counterparties to transactions or litigation, other law firms, other professional service providers, external legal advisers, regulators, law enforcement agencies, governmental institutions, tribunals and courts, third party agents and suppliers or contractors, our IT, cloud and communications service providers, and our auditors, accountants, professional advisers, employees and consultants.

What about international transfers of your PI?

9. It may be necessary for us in operating our business to transfer your PI to a recipient in a jurisdiction outside the Bailiwick of Guernsey or the EU, in which case we will ensure that if it is an authorised jurisdiction an adequacy decision is in force in respect of it or it is a designated jurisdiction under the Law, and if it is an unauthorised jurisdiction that there are appropriate or suitable safeguards applying to the transfer (a copy of which we can make available at your request).

For how long do we retain your PI?

10. We will retain your PI and ensure we keep it securely for as long as is necessary to carry out the purposes for which it was collected, to establish, exercise or defend our legal rights or for the purposes of legal proceedings, to satisfy any reporting or accounting obligations, for statistical purposes, and to comply with all applicable laws and regulatory requirements.

What rights do you have about your PI we process?

11. Under the Law you have the following rights: to information for PI collected from you and indirectly collected, to data portability (subject to exceptions), of access, to object to processing for direct marketing purposes or on grounds of public interest or for historical or scientific purposes, to erasure, to restriction of processing, to be notified of rectification, erasure and restrictions, and not to be subject to decisions based on automated processing of PI (we do not undertake automated processing), and to complain to the Data Protection Authority in Guernsey under section 67 of the Law.

What about changes to this Notice?

12. We will keep this Notice under review and may update it from time to time. This version is updated to **22 February 2019**.

How may you contact us?

13. If you wish to contact us about this Notice or to exercise any of your data protection rights, please contact us at 10 New Street, St Peter Port, Guernsey, GY1 2PF, or by telephone on 01481 724124, or by email at enquiries@guernseylegal.com.