

# **PRIVACY NOTICE**

## **INTRODUCTION**

Gustafson Porter + Bowman respects your privacy and is committed to protecting your personal information.

This privacy notice sets out how we collect and process your personal information when you contact us or visit this website.

If you have any questions about this notice or would like further information from us with regard to this notice, then please contact the Practice Manager at [enquiries@gp-b.com](mailto:enquiries@gp-b.com)

## **WHAT INFORMATION DO WE COLLECT?**

Personal information means any information relating to a person that enables them to be identified either directly or indirectly. Personal information that we collect about you may include:

- Your name (including title)
- Your personal and/or work address;
- Your personal and/or work email address;
- Your phone number;
- Your IP address;
- Your language;
- Your nationality;
- Your gender;
- Your date of birth;
- Your social network accounts;
- Your function/job title within your company;
- Your company's name;
- How you have heard about us;

We will take reasonable steps to ensure the personal information that we store is accurate, complete, and up to date.

## **HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

We collect information from and about you, including personal information that you provide when you:

- Correspond with us by post, phone, e-mail, social media or otherwise;

- Visit this website;

In order to improve the services we offer, we may also obtain additional, relevant, publicly available, personal information about you. Public information about you can consist of information published on the World Wide Web or personal information that you have made public (for example, on your social media profile).

## **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We will use your personal information for one or more of the following purposes:

- To manage our relationship with you, which may include assessing and responding to your queries and requests;
- To promote our business including invitations to events hosted by us;
- For our own administrative purposes, including training our staff, conducting internal audits, or transferring assets as part of a sale, purchase, or investment in the business;
- To conduct investigations of suspicious or harmful activity; and
- To comply with our regulatory and legal obligations.

We do not sell your personal information to others.

If we wish to use your personal information for a purpose beyond that for which it was originally provided, we will ask for your consent or seek to rely on another valid legal ground to process your personal information in accordance with the applicable law.

## **GROUNDINGS FOR PROCESSING PERSONAL INFORMATION**

To process your data lawfully, we need to rely on one or more valid legal grounds. The grounds we may rely upon include:

- Your consent to particular processing activities. For example, where you have made a job application;
- Our legitimate interests as a business (except where your interests or fundamental rights override these). For example, it is within our legitimate interests to use your personal information to prevent or detect fraud or abuses of our website;
- Our compliance with a legal obligation to which we are subject. For example, we have a duty to investigate and respond to complaints made against us and may need to process your personal information as part of such investigation; or
- Because processing your personal information is necessary for the performance of a contract.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

There are circumstances where we may wish to disclose, or are compelled to disclose your personal information to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure:

- To third party service providers and consultants in order to protect the security or integrity of our business, including our databases and systems, and for business continuity reasons;
- To another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution, or similar event. In the case of a merger or sale, your personal information will be permanently transferred to a successor company;
- To legal advisors who may need to manage or litigate a claim;
- To public authorities where we are required by law to do so; and
- To any other third party where you have provided your consent.

## **INTERNATIONAL TRANSFER OF PERSONAL INFORMATION**

We may transfer your personal data to a third party in countries outside the EU for further processing in accordance with the purposes set out in this notice. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means.

We may disclose your information to any person as required by law, and specifically to any government agency, if we believe in good faith, that we must do so to comply with the law or that doing so is required to prevent, detect, investigate, or remedy improper conduct potentially affecting us.

## **RETENTION OF PERSONAL INFORMATION**

Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this notice (unless longer retention is required by the applicable law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review.

## **CONFIDENTIALITY AND SECURITY**

Gustafson Porter + Bowman is committed to:

- Safeguarding all personal information that you provide to us;
- Ensuring that it remains confidential and secure; and
- Taking all reasonable steps to ensure that personal privacy is respected.

All our data is stored in written or electronic form on our servers, computers and in various physical locations. We are Cyber Essentials accredited and maintain physical, electronic, and procedural safeguards to protect your personal information from misuse, unauthorised access, disclosure and loss, or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, joint venture partners, and third parties who need to know that information for the purposes set out in this notice.

## **YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL INFORMATION**

Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of their personal information. Individuals also have the right to lodge a complaint with the relevant information protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

- Right to obtain a copy of your personal information. You may, where permitted by applicable law, request a copy of your personal information. If you would like to obtain a copy of this information, please contact our Practice Manager at [enquiries@gp-b.com](mailto:enquiries@gp-b.com). We will require proof of your identity before providing you with details of any personal information we may hold about you.
- Right to rectification. You may request that we rectify any inaccurate and/or complete any incomplete personal information.
- Right to withdraw consent. You may, as permitted by law, withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent.
- Right to object to processing. You may, as permitted by law, request that we stop processing your personal information.
- Right to erasure. You may request that we erase your personal information, and we will comply, unless there is a lawful reason for not doing so.
- Your right to lodge a complaint with the supervisory authority. We suggest that you contact us about any questions, or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority directly. To contact the Information Commissioner's Office in the United Kingdom, please visit the [ICO website](#) for instructions.

## **COOKIES**

We use Squarespace analytics to gather anonymous information about visitors to our website. For example, we use this software to track which pages of our website are viewed.

To collect anonymous traffic data to enable the website analytics to work, Squarespace analytics use "cookies" which collect the first level domain name of the user, and the date and time the user accessed our website. Cookies by themselves cannot be used to reveal the user's identity.

A cookie is a small file that a website or its service provider transfers to your computer's hard drive, mobile phone, or other device, through your web browser that enables the websites, or service providers systems, to recognize your browser and capture and remember certain information.

- Cookies can be first-party, or third-party cookies:
  - First-party cookies – cookies that the website you are visiting places on your computer.
  - Third-party cookies – cookies placed on your computer through the website, but by third parties, such as Squarespace.

You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. Alternatively, you can choose to turn off all cookies via your browser settings. For more information, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and <http://www.youronlinechoices.com/uk/>.

## **LINKS**

Our website occasionally provides hyperlinks to websites owned and controlled by others. Gustafson Porter + Bowman is not responsible for the privacy practices of any website that it does not own, or otherwise control.

## **COMPLIANCE WITH PRIVACY LAWS**

Gustafson Porter + Bowman complies with the data protection and privacy laws to which it is subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time.

Except to the extent expressly stated otherwise in this notice, Gustafson Porter + Bowman accepts no obligations with respect to the handling of personal information other than those mandated by law in the country which has, or counties which have, jurisdiction over Gustafson Porter + Bowman in any given circumstances.

## **CHANGES TO THIS NOTICE**

As we strive to improve our practices, we may review this notice from time to time. We reserve the right to change this notice at any time, and to notify you of those changes, by posting an updated version of this notice on our website. It is your responsibility to check our notice each time before you access our website for any changes.