

Introduction

- 1.1 <https://barristerlink.co.uk> (the 'Website') is provided by Barrister Link Limited ('we', 'our' or 'us'). We are a company incorporated under the laws of England and Wales with the name Barrister Link (13332874) and with its registered office address at Dryden Enterprise Centre, Dryden Street, Nottingham, NG1 4EY, UK.
- 1.2 We are the owner of the Website. We are legally responsible for processing personal data obtained through the Website.
- 1.3 We take your privacy very seriously. Please read the paragraphs of this privacy notice ('Privacy Notice') carefully as it contains important information whom we are and how and why we collect, store, use, share, and transfer any information relating to you ('Personal Data') in connection with your use of the Website.
- 1.4 The Privacy Notice also explains your rights in relation to your Personal Data and how to contact us or a relevant regulator in the event you have a complaint.
- 1.5 When you engage our professional services you supply us with your Personal Data. We collect, use and are responsible for your Personal Data. When we do so we are subject to the UK General Data Protection Regulation ('UK GDPR'). We are also subject to the EU General Data Protection Regulation ('EU GDPR') in relation to professional services we offer to individuals and our wider operations within the European Economic Area ('EEA').

2 Your consents and rights

- 2.1 It is necessary we obtain your consent to collect and use your Personal Data. By opening an account with us, you:
 - 2.1.1 acknowledge, understand, and accept you have read and understood the Privacy Notice; and
 - 2.1.2 consent to our collecting and use of your Personal Data in accordance with the Privacy Notice.
- 2.2 For the avoidance of doubt, you consent to our collecting and use of your Personal Data for the purposes expressed within the Privacy Notice and of:
 - 2.2.1 opening and maintaining an account with us;
 - 2.2.2 using the Website;
 - 2.2.3 carrying out necessary identity checks upon you;
 - 2.2.4 providing our professional services to you;
 - 2.2.5 sharing your Personal Data with trusted third parties;
 - 2.2.6 where appropriate, transferring your Personal Data into the UK;
 - 2.2.7 where appropriate transferring your Personal Data outside of the UK or the EEA or both;

- 2.2.8 carrying into effect those actions referred to in paragraph 4 of the Privacy Notice; and
- 2.2.9 such other purposes as we may advise you from time to time.
- 2.3 Nothing within the Privacy Notice will affect our right to collect and use Personal Data regarding you in the event such data is placed lawfully within the public domain.
- 2.4 Your consent to our collecting and use of your Personal Data in accordance with the Privacy Notice will endure for the duration of your account with us.
- 2.5 You have the right to withdraw your consent easily and at any time. You may withdraw your consent by contacting us in writing.
- 2.6 Withdrawal of your consent will immediately cause your account with us to terminate and you will not have access to our professional services without reinstating your account and providing your consent.
- 2.7 Withdrawing your consent will not affect the lawfulness of our use of your Personal Data in reliance upon that consent prior to its withdrawal.
- 2.8 You can correct your Personal Data when it is found to be incorrect, it has become out of date, or in the event it is incomplete.
- 2.9 You have the right to be supplied with a copy of your Personal Data, held by us. To keep your Personal Data safe, we will ask you to verify your identity.
- 2.10 In the event a third party requests your Personal Data or any information on your behalf, we will require proof that they are acting with your permission. The Personal Data or information or both will be supplied within a reasonable period of time following such request. You will be charged for the copy of your Personal Data only in those cases where we incur legitimate costs in supplying the same.
- 2.11 To ask for a copy of your Personal Data held by us, please contact us by post, email, or telephone.

3 The Privacy Notice

- 3.1 The Privacy Notice explains those types of Personal Data we may collect about you when you have contact with us and use our professional services. It explains how we will store and handle your Personal Data and how we will keep it safe.
- 3.2 The Privacy Notice relates to your use of the Website and our professional services only.
- 3.3 Throughout the Website we may link to other websites owned and operated by certain trusted third parties to make available our professional services to you. Those third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies as appropriate.

4 Personal Data

- 4.1 The Personal Data we collect about you may depend upon the particular activities carried out through the Website. We will collect and use the following Personal Data about you:
 - 4.1.1 your name, postal address, and other contact information, including email address and telephone number and, where appropriate, any company details;
 - 4.1.2 information to check and verify your identity, including date of birth, nationality, immigration status within the UK or other countries, where the law requires this;
 - 4.1.3 your social media username, in the event you interact with us through such media channels;
 - 4.1.4 your gender, if you choose to give this to us;
 - 4.1.5 location data, if you choose to give this to us;
 - 4.1.6 information about the matter upon which you require the professional services from us and a barrister;
 - 4.1.7 information regarding legal proceedings in which you have been, are, or are to be involved;
 - 4.1.8 your billing information, transaction, and payment card details or other payment method information;
 - 4.1.9 bank account and payment details;
 - 4.1.10 details of any information, feedback, or other matters you give to us by phone, email, post, or through social media;
 - 4.1.11 your account details, such as username and login details; and
 - 4.1.12 your activities on and use of the Website.
 - 4.2 You must provide your Personal Data to use the Website and the professional services advertised upon the Website, unless we tell you that you have a choice.
 - 4.3 Sometimes you can choose if you want to give us your Personal Data and let us use it. Where that is the case we will tell you and give you the choice before you give the Personal Data to us. We will also tell you whether declining to share that Personal Data will have any effect upon your use of the Website or any of the professional services advertised upon the Website.
- ## 5 How Personal Data is collected
- 5.1 We collect Personal Data from you when, directly or indirectly:
 - 5.1.1 you enter or send us information, such as when you register with us, contact us, including through email, telephone or the Website, send us feedback, create an account, purchase professional services through us, post material to the Website and complete customer surveys;

- 5.1.2 you comment upon or review our professional services;
- 5.1.3 you have given permission to a third party to share with us the information they hold about you;
- 5.1.4 you contact us by any means with an enquiry or a complaint; and
- 5.1.5 you engage in browsing activity while upon the Website.

6 How and why we use Personal Data

- 6.1 Under data protection laws, we can only use your Personal Data if we have a proper reason such as:
 - 6.1.1 where you have given consent;
 - 6.1.2 to comply with our legal and regulatory obligations including but not limited to money laundering compliance or the prevention of fraud or other criminal activity. In such circumstances we may be bound by law to pass your Personal Data to legitimate authorities;
 - 6.1.3 for the performance of a contract with you or to take steps at your request before entering into a contract; or
 - 6.1.4 for our legitimate interests or those of a third party. A legitimate interest is when we have a business or commercial reason to use your Personal Data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us.

7 Protecting Personal Data

- 7.1 We:
 - 7.1.1 take our responsibility for the security of your Personal Data seriously;
 - 7.1.2 have appropriate security measures in place to prevent Personal Data from being accidentally lost, used, accessed unlawfully, or stolen;
 - 7.1.3 protect Personal Data upon devices from unauthorised access by using passwords, encryption, and security software;
 - 7.1.4 follow recommended protocols for good online security and we review these on a regular basis;
 - 7.1.5 limit access to your Personal Data to those whom have a genuine need to access it. We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security; and
 - 7.1.6 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.

8 Sharing Personal Data

- 8.1 We may share your Personal Data with trusted third parties such as:
 - 8.1.1 persons we use to help deliver our professional services to you, such as barristers, solicitors, and other professional advisors;
 - 8.1.2 payment service providers;
 - 8.1.3 third parties we use to help us run and support our business, such as IT companies, operational companies such as delivery couriers, marketing agencies or website hosts and website analytics providers;
 - 8.1.4 our bank or banks;
 - 8.1.5 persons necessary to prevent fraud and other crimes; and
 - 8.1.6 persons necessary to deal with your comments or complaints.
- 8.2 We only allow trusted third parties to handle your Personal Data in the event we are satisfied they take appropriate measures to protect your Personal Data.
- 8.3 We impose contractual obligations upon trusted third parties to ensure they can only use your Personal Data to provide services to us and to you.
- 8.4 We or those trusted third parties referred to above may occasionally share your Personal Data with:
 - 8.4.1 our and their external auditors, such as in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;
 - 8.4.2 our and their professional advisors, such as lawyers and other advisors, in which case the recipient of the information will be bound by confidentiality obligations;
 - 8.4.3 law enforcement agencies, courts, government bodies, tribunals, and regulatory bodies to comply with our legal and regulatory obligations; and
 - 8.4.4 other parties that have or may acquire control or ownership of our business and in such eventuality our or their professional advisers in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering, or in the event of our insolvency. Usually, information will be anonymised but this may not always be possible. The recipient of any of your Personal Data will be bound by confidentiality obligations.
- 8.5 If you would like more information about who we share our data with and why, please contact us.
- 9 How long your Personal Data is kept
 - 9.1 Different retention periods apply for different types of Personal Data.
 - 9.2 We will not retain your Personal Data for longer than we need it for the purpose for which it is used. Subject to paragraph 9.3, the period of time for which your Personal

Data will be used will be based upon that period of time for which you keep an account with us.

9.3 In the event you stop using your account with us, we will delete or anonymise your account data after the shorter period of:

9.3.1 7 (seven) years from ceasing to use your account with us; and

9.3.2 such period of time as we are required by law to keep your Personal Data.

9.4 Following the end of the of the relevant retention period, we will delete or anonymise your Personal Data.

10 Transferring your Personal Data out of the UK

10.1 The UK and countries within the EEA have differing data protection laws, some of which may provide lower levels of protection of privacy.

10.2 We will transfer your Personal Data to:

10.2.1 our service providers located outside of the UK in USA.

10.3 As we are based within the UK, in the event you are located outside of the UK and we will transfer your Personal Data from the EEA to the UK.

10.4 Under data protection laws, we can only transfer your Personal Data to a country outside of the UK or EEA where:

10.4.1 in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') further to Article 45 of the UK GDPR;

10.4.2 in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an 'adequacy decision') further to Article 45 of the EU GDPR;

10.4.3 there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or

10.4.4 a specific exception applies under relevant data protection law.

10.5 Where we transfer your Personal Data outside of the UK, we do so on the basis of an adequacy regulation or where this is not available legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR.

10.6 In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your Personal Data outside of the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to the Privacy Notice.

10.7 Where we transfer your personal data outside of the EEA we do so on the basis of an adequacy decision or (where this is not available) legally-approved standard data protection clauses issued further to Article 46(2) of the EU GDPR].

10.8 In the event we cannot or choose not to continue to rely upon either of those mechanisms at any time we will not transfer your Personal Data outside of the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable data protection law and reflected in an update to the Privacy Notice.

10.9 Any changes to the destinations to which we send your Personal Data or in the transfer mechanisms we rely upon to transfer your Personal Data internationally will be notified to you in accordance with the section on 'Changes to this Privacy Notice below.

11 How to complain

11.1 Please contact us if you have any queries or concerns about our use of your Personal Data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

11.2 You also have the right to lodge a complaint with:

11.2.1 the Information Commissioner within the UK;

11.2.2 our lead supervisory authority in the EEA, which is *[insert]*; and

11.2.3 a relevant data protection supervisory authority within the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA.

11.3 The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

12 Changes to the Privacy Notice

12.1 We may change the Privacy Notice from time to time. When we make significant changes we will take steps to inform you by including a prominent link to a description of those changes on the Website for a reasonable period or by other means, such as email.

13 How to contact us

13.1 You can contact us by post, email, or telephone if you have any questions about the Privacy Notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.