



# Privacy Policy



## INTRODUCTION

GJE is committed to protecting the privacy of our website visitors, clients, third party service providers and other business contacts. This policy sets out how we will collect, use, store and transfer any personal data in the course of our business and the measures which we will use to protect security.

In using our website or otherwise corresponding with us, you consent to our collection, use, disclosure and international transfer of any personal information which you choose to provide on the terms of this Privacy Policy as set out below. Where you engage us to provide services, our Client Data Protection Policy will apply.

Where we hold personal data, GJE will act as a data controller and will be responsible for determining the permitted purpose, extent and means of any processing of that data. This policy is adopted by each of the GJE entities, GJE LLP in the UK and GJE GmbH in Germany. Your data will be controlled by our Global Data Protection Managers ('DPMs') to whom any enquiry is directed or which is otherwise providing services, contracting or communicating with you.

You have the right at any time to obtain confirmation of any personal data which we hold, verify its contents or request that such data be updated, restricted or erased as explained below.

## 1. TYPES OF PERSONAL DATA

- Data you provide to us: you may choose to provide us with personal data when you are introduced to us, in person, by phone, email, or via social media or our website. This may include information which can be used to identify you or that we can link to you, including your name, contact information, job title and any associated organisation and any other information which GJE may use to identify you in relation to our services. This information may fall into the following categories:

- Correspondence, events and updates – we may process information contained in or relating to any communication which you send or otherwise provide to us including for the purposes of subscription to our newsletters and other publications; registration for seminars and other events, recruitment, maintaining our list of contacts and other purposes
- Enquiries relating to our services - we may process information contained in any enquiry that you submit to us indicating your interest in our services or any position with the firm, including the contents of your enquiry and any contact details. We process such data for the purposes of responding to your enquiry and updating you in relation to our services where appropriate, unless you indicate to us that you no longer wish to hear from us
- Contract information – where we enter into a contract to provide services to you or for the provision of third-party services to the firm, we may process personal data for the purposes of that contract and our related business services. This may include personal information contained within contract related correspondence, data provided for the purposes of the contract and/or transactional data and bank account information for the purposes of supplying and receiving services, making payments and record-keeping



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- Information we collect online: you are not required to provide any personal information when you browse our website unless you choose to contact us and voluntarily provide information to us, however certain data may automatically be provided about your use of the website. This may include your computer's browser type, operating system and IP address, as well as the date and time of your visit, geographical location and information about your navigation and use of the website and pattern and length of use and any referral source. This information will be used for evaluation of site use, assessment and improvement of site performance and improvement of the functionality and services that we are able to offer, and will not be used for any other purpose. We may share this information with third parties appointed to assist us in the maintenance, operation and analysis of the use of our website. For further information about how we use Cookies and the choices you may have, please see our Cookies Policy

- Information we collect from third-party sources: We may obtain information about you from other public sources or by introduction by third parties which we may use to help us update and analyse our records, identify potential new clients and for compliance and regulatory checks

## 2. PROCESSING PERSONAL DATA

We rely on the following legal grounds to process your personal information depending on the purpose for which it has been obtained:

- Performance of a contract – this may be relied on for performing our obligations under a contract with you or your organisation or to take steps at your request prior to entering into a contract with you. This may involve processing of personal data provided in correspondence, enquiries and for the purposes of contracts and transactions
- Consent – where you have expressly consented to use of information for a specific purpose, including subscription to our newsletters, updates or invite to events

- Legitimate interests – where processing is necessary for the purposes of our legitimate interests or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your own interests or fundamental rights and freedoms. This may be relied on for the purposes of:

- responding to correspondence and enquiries and developing our business with interested parties and keeping in touch;
- use of transactional data for the purposes of making and receiving payments and pursuing recovery of debts was necessary;
- business data analysis to assess the effectiveness of our services;
- detecting, preventing and responding to actual or potential fraud or other illegal activities or intellectual property infringement;
- processing of any personal data which we hold for the operation of our IT and data security systems including backups of any element of our IT systems or databases containing personal data to ensure the resilience of our IT systems and the integrity and recoverability of our data; and



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- processing of any personal data which we hold for the purposes of protecting and asserting our legal rights and those of others in relation to legal claims
- Compliance with legal obligations or protection of vital interests - we may process any personal data which we hold where this is reasonably necessary or appropriate for compliance with our legal obligations, including record keeping and regulatory requirements or to protect the vital interests of the data subject or any another individual

### 3. SHARING PERSONAL DATA WITH THIRD PARTIES

We may share your personal data with third parties in the following circumstances:

- with our employees, partners and consultants and with other GJE entities on a confidential basis where required for the provision of our services, internal administration, billing, compliance and reporting, promoting our events and services and other business purposes;
- where we provide services to you, with third-party providers for the purposes of our services;
- with third party providers who host the services on which our data is stored, our IT and marketing consultants and other suppliers of business and administrative services including debt recovery;
- with third party providers for the purposes of money laundering and other compliance and reference checks and other fraud and crime prevention purposes;
- with our insurers and professional advisors as is necessary for the purposes of obtaining and maintaining insurance cover, obtaining professional advice, managing legal disputes and maintaining accounts records and financial audits; and

- with any third party to whom we assign or novate any of our rights or obligations or any part of our business is sold or transferred to, or integrated with another organisation

Any information which we share with third-party providers will be pursuant to contractual arrangements which we put in place which require that the data is processed only in accordance with our instructions for specified purposes and applicable law.

GJE also reserves the right to disclose any information which it holds where necessary: a) to appropriate courts, law enforcement authorities, governmental or regulatory authorities, if required to do so by law or regulation or by any governmental or law enforcement agency; and b) in order to protect the vital interests of the data subject or of any other individual.



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## 4. PROTECTING AND STORING PERSONAL DATA

We use administrative, technical and physical measures to keep your personal data confidential and secure, in accordance with our internal procedures to protect it from being accidentally lost, altered, used, accessed or disclosed in an unauthorised way. Personal data may be held on our data technology systems, those of our third-party contractors and/or in paper files. Where we share information with third parties, we will obtain written confirmation that they will similarly protect the data with appropriate safeguards.

Although we do our best to ensure the security of your personal data and to use only reputable service providers, unfortunately no information system can be 100% secure and we cannot guarantee the absolute security of your information. In particular, we will not be responsible for the security of any information which you transmit to us over networks that we do not control including the internet and wireless networks. We have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If you follow any link from our website to a third-party website or deal with any third party entity referred to on the website, you should be aware that third parties will have their own privacy terms and that we are not responsible for their use of any personal data which you share with them and you should ensure that you have read and understood the policies of that third party.

## 5. TRANSFERRING YOUR PERSONAL DATA ABROAD

As GJE operates globally, we may transfer your personal data abroad for storage or processing where required for any of the purposes set out above, including any of the countries in which GJE and its affiliates, agents or contractors have offices. When doing so, we will comply with applicable data protection require-

ments and take appropriate safeguards to ensure the security and integrity of your personal data. Where we use third party service providers, we will put in place confidentiality agreements, including appropriate data protection obligations.

## 6. HOW LONG WE RETAIN PERSONAL DATA

Any personal data will be deleted when it is no longer reasonably required for the permitted purposes for which it is held or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing the data. Where necessary, we will retain your personal data where it may be required for GJE to assert or defend any legal claims or otherwise asserts its rights or those of third parties until the end of the relevant retention period or until any claims have been resolved. We will also retain personal data where necessary to comply with our legal obligations, regulatory requirements and reporting obligations. We may also hold data in backup systems which are put in place to maintain the integrity of our IT systems for the minimum retention periods.

## 7. YOUR RIGHTS: TO REVIEW, UPDATE, RESTRICT THE USE OF, AND/OR REQUEST ERASURE OF YOUR PERSONAL DATA

If you no longer wish to receive updates and communications from us, you can let us know by sending us an email to the contact details provided below or unsubscribing.



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GJE has a legal obligation to ensure that any information which you provide remains accurate and up to date and we would ask that you contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate. Subject to local law, you have a right at any time:

- to request details of any categories of personal data which we hold about you, the purposes for which we process the data and any third parties with whom it is shared. Provided the rights and freedoms of others are not affected we will supply you with a copy of the data;
- to ask us to update or correct any personal information which we hold, object to or ask us to restrict the processing of that personal data for particular purposes. You may object to the processing of personal data for direct marketing purposes and withdraw any consent you have previously given to us at any stage by notifying us by email to [dataprotection@gje.com](mailto:dataprotection@gje.com) or using the other contact details below. Where you object to the data being processed for other purposes, we will not do so unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms, including compliance with legal obligations and for the purposes of legal claims;
- where the personal data is no longer necessary for the purposes for which it was collected, you may have the right to request that it be erased but this may be overridden where the data is necessary for other purposes including compliance with a legal obligation or in connection with potential legal claims;
- where we hold personal data with your consent or for the performance of a contract with you and processing is carried out by automated means, you may have the right to receive your personal data from us in a commonly used format so that it can be transferred to an alternative third-party provider, provided it would not adversely affect the rights and freedoms of others;

- to lodge a complaint with the appropriate supervisory authority.

If you wish to exercise any of your rights in relation to your personal data, please contact us by email using the contact details below.

### 8. CHANGES TO THIS PRIVACY POLICY

We may revise and update this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal data, changes in applicable legal requirements or guidance. We will publish the updated Privacy Policy on our website and you should review this page periodically to ensure that you are aware of any change to its terms.

### 9. HOW TO CONTACT US

If you require any further information or would like to contact us with any queries or comments, please contact the DPMS:

By email: [dataprotection@gje.com](mailto:dataprotection@gje.com)



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