

## Privacy policy

This privacy policy sets out how we at Gill Jennings & Every LLP (“GJE”) use and protect any information that you provide when you use our services. We respect your privacy and are committed to being transparent about how we collect and use your data to meet our obligations and your rights.

GJE, as the data controller of any personal data you provide, is committed to ensuring that your privacy is protected, and complies with the General Data Protection Regulations 2016 (“GDPR”) and The Privacy and Electronic Communications (EC Directive) Regulations 2003.

This policy is effective from 25 May 2018. We may update this policy from time to time. You should check our policy from time to time to ensure that you are happy with any changes.

Our website-specific Privacy and Cookie Policies are available on our website [www.gje.com](http://www.gje.com).

### What we collect

Personal data is data that can be used to identify you or that we can otherwise link to you.

We will need to hold and retain some of your personal data in order to carry out work on your behalf in connection with your Intellectual Property Rights and the rights of others (“IPR”) and for as long as is necessary at the end of that work, to advise on, acquire, maintain, protect and defend those rights.

The data we collect may include the following generic types, which we use to:

- Identify you, such as first name, last name, or username. If we act for you in your personal capacity, we may also ask for photo ID to comply with our Money Laundering and Proceeds of Crime Act obligations
- Contact you, such as postal addresses, emails and telephone numbers
- Provide IPR-related products or services to you, including details of the work we carry out for you or which affects you
- Market to you, which includes your preferences in terms of collateral, sector information or general IP knowledge

We may collect your data through a variety of means, including directly from you when you instruct us or ask for advice, from your use of our website, from your use of our Client Portal, or from publicly available third-party sites such as other firms, Intellectual Property Offices, or others acting in the Intellectual Property sector.

### **Our lawful basis for using your data**

We will use your personal data when:

- We consider it necessary to process your personal data in order to perform our contract with you to advise on, acquire, maintain, protect and defend your IPR and the Rights of third parties
- We have a binding legal obligation to comply with statutory or other requirements
- We consider it in our joint legitimate business interests
- We have your specific, informed and unambiguous consent to use your data.

### **What we do with the information we gather**

We use the personal data provided to us either by yourself or your employer to advise on, acquire, maintain and defend your Intellectual Property Rights and the Rights of third parties, as appropriate.

We may also use your data where appropriate for the following reasons:

- for internal record keeping
- to improve our products and services
- to periodically send promotional emails about new products, special offers or other information which we think you may find interesting
- from time to time for market research purposes.

We may contact you by email, phone, fax or mail, according to your preferences. We may use the data obtained to customise our website according to your interests

We may make your personal data available to selected third parties who are involved in obtaining, maintaining or defending your Intellectual Property Rights and the Rights of third parties, as appropriate. This may include updating public records of your IPR, for example with Intellectual Property Offices in the UK, Europe and abroad. We may, at your instruction, share your data with IPR renewal providers and other IPR service providers both within and outside the EEA. Some of our suppliers may have access to certain personal data when they perform services on our behalf, such as to maintain and support our IT systems. However, all such third-parties will comply with their and our GDPR obligations, and are used strictly for the purposes of supporting our technology and in accordance with our instructions to them, and contract with them.

Where necessary, we will use your data to make credit decisions about you and to prevent fraud we may request a credit reference agency to undertake a credit reference on you. Under exceptional circumstances, we may need to employ debt collection agencies, and will provide your last known contact details to them.

Any international transfers of your personal data outside the EEA are based on data processing agreements for which we rely on EU approved Safe Haven provisions.

### **Measures to keep your data safe**

We employ appropriate physical, technical, organisational and managerial measures to help protect your personal data against loss and unauthorised access. We regularly review our security policies and procedures to ensure our systems are secure and protected.

We have put in place procedures to manage any data breaches, and if any occur will report to you and the Information Commissioner's Office ("ICO"), in accordance with our data protection obligations.

We will not sell or lease your personal information to third parties.

### **Your choices and rights**

You may choose to restrict the collection or use of your personal information. If you have previously agreed that we may use your personal information for direct marketing purposes, you may change your preferences or unsubscribe altogether at any time by clicking this link which will take you to your marketing preferences page.

If you believe that any data we are holding on you is incomplete or incorrect, please contact us as soon as possible. We will promptly correct any data found to be incorrect.

You can object to certain personal data being processed or ask that processing be limited.

You have the right to have your data transferred to another data controller.

In certain circumstances, you have the right for your personal data to be erased (the right to be forgotten), although it may be impossible to exercise that right in full where we have a legal obligation to retain those data, or for the establishment, exercise or defence of legal claims.

Please note that the limitation or deletion of your personal data may mean that we will be unable to provide you with the information and services described above.

You may request details of personal information which we hold about you by contacting us. Please head your correspondence "Data Subject Access Request". We may undertake additional checks to ensure your data is not shared with anyone else. We are obliged to respond to your request within one month of the receipt of your request.

For more information about your rights, you may contact The Information Commissioner, whose details are at [www.ico.org.uk](http://www.ico.org.uk).

### **How to contact us**

If you have any questions about how we process your personal data, please feel free to contact us at [dataprotection@gje.co.uk](mailto:dataprotection@gje.co.uk).

If you want to exercise any of your rights under the General Data Protection Regulations 2016, please contact us at the above email address, or write to The Data Protection Officer at the address below.

If you are dissatisfied with the way we process your personal data, please write to The Managing Partner at the following address.

Gill Jennings & Every LLP

The Broadgate Tower

Primrose St

London

EC2A 2ES

If you are still dissatisfied with the way we have processed your data after we have responded to you, you may contact the Information Commissioner's Office directly.