



## **Privacy Policy for Clients.**

Gundog PR Limited ("Gundog PR", "We", "us" or "our") is committed to protecting and respecting your privacy.

This privacy notice sets out the basis for which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection laws, the data controller is Gundog PR Ltd, 3 Milton Terrace, Grange, Cumbria, LA11 6AG.

### **What information do we collect about you?**

All client data will be held by us in our manual and automated filing systems.

This may include;

contact details (including names, postal addresses, email addresses and telephone numbers);

### **How is your personal information collected?**

Your personal information may be collected directly from you during the process of setting you up as a client of ours or during the course of taking instructions from you or providing you with communications advice. We may also collect information from third parties including other online sources.

### **Purpose – how will we use your personal information?**

We will only use your information when it is fair and lawful to do so. Most commonly, we will use your personal information in the following circumstances:

Where we need to perform the contract that we have entered into with you;

Where we need to comply with a legal obligation;

Where it is necessary for our legitimate interests (or those of a third party) namely to provide you with advice and assistance or in facilitating and enabling the management of all matters relating to our business, but only where your interests and fundamental rights do not override those interests;

Where you have given your consent and that consent has not subsequently been withdrawn by you.

We may also use your personal information in the following circumstances, which are likely to be rare:

Where we need to protect your interests (or someone's interests).

Where it is needed in the public interest.

The situations where we will process your personal data are listed below:

to fulfil our contract with you;

to provide you with our services;

to provide you with information about our services;

to invite you to events or seminars that may be of interest to you;

to provide you with updates about the marketplace and other topics that may be of interest to you;

for marketing and advertising purposes;

for intra group transfer or transfers to third party administrators for administration purposes; and

the enforcement of legal claims including debt collection including via out-of-court procedures.

#### **Disclosure of data.**

We may share your personal information with third parties, where this is reasonably necessary, for the purposes set out in the policy. Third parties may include third-party service providers (including contractors and agents), law enforcement agencies and any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. We may also disclose your personal information with other third parties, for example in the context of the possible sale or restructuring of the business.

Data may also be disclosed if we are under a duty to share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business and other agreements from time to time; or to protect the rights, property, or safety of Gundog PR, our clients, or others. This includes exchanging information with other companies and organisation for the purposes of fraud protection and credit risk reduction.

#### **Transfer and storage of data outside the EU.**

The personal information you provide to us may be transferred and stored outside of the EEA for the purposes of carrying out administration and other functions necessary to provide our services to you. Any personal information transferred will receive an adequate level of protection as required by the Data Protection laws. Third parties will only process your personal information on our instructions and in the agreement that the information is kept secure and confidential.

Where any transfer is made to a third party supplier (for example to someone that we have outsourced an administrative function to or a provider of storage) outside of the EEA and the European Commission has not made an adequacy decision in relation to the laws of that country we

will ensure that appropriate safeguards are in place prior to any transfer of your data. Those safeguards are likely to consist of either the use of standard data protection clauses adopted or approved by the European Commission or transfer to a US based recipient which is a member of the EU-US Privacy Shield self-certification arrangement or an equivalent regime.

Where any transfer is made to another lawyer, adviser or expert witness outside of the EEA we will usually do this on the basis that the transfer is necessary for the performance of our contract with you.

### **Data Subject Rights.**

Under certain circumstances, you have the right to:

Access your information.

You are entitled to request access to the information we hold about you (known as a 'data subject access request'). You are entitled to receive a copy of the personal information we hold about you and to check that it is being lawfully processed.

Correct your information.

If the information we hold for you is incomplete or incorrect, you have the right to request a correction.

Request erasure.

Where there are no reasons for continuing the processing of your personal information, you are able to request the removal or deletion of the personal information.

Object to processing.

Where the firm relies on legitimate interest for the processing of your personal information, or for the purposes of direct marketing, you have the right to object to the processing.

Request the restriction of processing.

You are entitled to request for a suspension for the processing of your personal information, for example, if you are awaiting the reasons for the processing of the information or require us to establish its accuracy.

Transfer your personal information.

You are able to request the transfer of your personal information to another party.

It is important that the personal information we hold for you is accurate and up to date. If you would like to review, verify, correct or request erasure of your personal information, object to the processing of your personal data or request that we transfer a copy of your personal information to another party, please contact [info@gundogpr.co.uk](mailto:info@gundogpr.co.uk)

**No fee.**

These rights are available to you at no cost; however, we may charge a reasonable fee where a request is deemed to be excessive or unfounded. In such circumstances, we may otherwise refuse to comply with the request.

### **How long is your personal data retained?**

Our retention period is based on statutory authority and will be held for a minimum of five years, which may be extended dependant on the nature of your relationship with the firm. Personal information may be retained for as long as necessary to comply with our legal obligation, or in order to protect yours or another person's vital interest.

### **Security.**

We understand the importance of protecting your privacy and we will ensure your data is safeguarded and held securely in accordance with our obligations under the Data Protection laws. Appropriate technical and organisational measures have been implemented to ensure personal information is protected and to prevent your personal data from being lost, used, accessed in an unauthorised way, altered or disclosed. Details of these measures are available upon request. We also limit access to your personal information to those employees, contractors and other third parties who have a business need to know. This access will be granted on a confidential basis and processing of the information will only take place subject to our instruction.

We have in place procedures and a policy to deal with any potential data security breaches, and data subjects and any applicable regulators will be notified where we are legally required to do so.

### **Complaints.**

If you consider that our processing of your personal information infringes the Data Protection laws, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

### **How to contact us.**

By email at [info@gundogpr.co.uk](mailto:info@gundogpr.co.uk) or write to us at, FAO of Risk and Compliance Officer, Gundog PR, 3 Milton Terrace, Grange, Cumbria, LA11 6AG.

### **Revisions to our Privacy Policy.**

We reserve the right to revise this policy or any part of it from time to time and will provide you with a new policy notice where any substantial updates are made. We may also notify you through other means, about the processing of your information.