

Privacy Notice

Zedra Legal Services (UK) Limited



This Privacy Notice sets out how Zedra Legal Services (UK) Limited collects, uses and discloses your personal data when you use our legal services either as an individual or as a representative of a company. We are committed to handling your personal information responsibly and ensuring that your personal data is protected. This Privacy Notice also confirms your rights as a data subject.

In this Privacy Notice, "ZEDRA", "us", "we" and "our" refers to the Zedra Legal Services (UK) Limited. "You" refers to the person whose personal data we process. "Processing" means any operation performed on your personal data.

ZEDRA is the controller of your personal data and determines the purposes and means by which your personal data is processed and is ultimately responsible for the processing of that personal data.

We may amend this Privacy Notice from time to time to reflect any changes in the way that we process your personal data and the current Privacy Notice will always be available on the ZEDRA Group website.

1. What personal data do we process and for what purposes?

We collect your personal data in a variety of ways such as:

- In most cases, from the information and documentation that you provide including by filling in forms or by corresponding with us by post, phone and email;
- From third parties, such as other clients, counterparties, sanctions and background check providers;
- From other ZEDRA companies or employees;
- From publicly available sources such as Companies House.

We've set out the specific categories of personal data we collect, use and process and the reasons why we collect, use and process that data in the table below. In addition, we are required to have, and to inform you of, the legal basis (or "ground") we rely upon for each use of your personal data listed in the table. "Legal bases" are the legal reasons for our use of your personal data – these are set out in applicable data protection laws. We cannot use your personal data without one. Please see the table below for more information about the legal bases we rely on.

Personal Data we process	Why do we process it?	Legal Basis for processing
Contact details (Name, company name, job title, telephone numbers, email addresses, postal address) Identity data (Passport number, driving license, utility bill or bank statement (to confirm address), date of birth, source of funds/wealth, previous convictions/offences).	Onboarding you or your organisation as a client – conducting know your client (KYC), anti-money laundering (AML) and sanctions checks	Compliance with our legal obligations to conduct such checks.
Contact details; and Information required to provide the services (Information about client structures, investor details and anything else that is involved in providing our service including sensitive information regarding health).	Providing legal services and maintaining the financial and other personal data we are required to keep under the professional rules we are subject to and by law, including our obligations to HM Revenue and Customs.	To perform the contract we have with you or because it is in our legitimate interests to fulfil the contract with have with the company you represent. Compliance with our legal and regulatory obligations.
Financial data (bank account details and billing address)	Sending funds to you where this is required.	To perform the contract we have with you or because it is in our legitimate interests to fulfil the contract we have with the company you represent.
Contact details; and Information about your preferences in receiving marketing from us.	Sending you marketing information.	Your consent, where we are legally required to obtain your consent or because it is in our legitimate interests to market out services.

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2. Automated decision-making

We do not as a law firm conduct automated decision making or profiling using your personal data.

3. Who has access to your personal data?

Our work for you may require us to provide the personal data we hold on you to various third parties such as:

- Other ZEDRA group entities that provide outsourced functions to us or that are working with us to provide the services;
- Expert witnesses and other professional advisers;
- Regulators and regulatory authorities such the Solicitors Regulation Authority as our regulator;
- Our bank if details are required by them in relation to the operation of our client account and we are holding monies for you accordingly;
- Our auditors and also any quality management inspectors for any such schemes to which we subscribe;
- A third party (such as an accountant or estate agent and so on) who is helping with the matter;
- Law Society of England and Wales if they conduct an inspection;
- The National Crime Agency where we have a duty under the law to make a disclosure to them;
- Our insurers in the event of a claim or potential claim.

Where appropriate we will obtain confidentiality agreements from any such relevant external sources including where we outsource any business support functions.

4. International data transfers

In sharing your personal data for the reasons set out in this Privacy Notice, we may need to transfer it to countries outside the UK. In particular, ZEDRA Group's servers are located in the UK, Jersey, Luxembourg and Switzerland, which means your personal data may be transferred to any one of these locations when being shared within the ZEDRA Group.

Any such transfers will be carried out in accordance with applicable data protection law and we will ensure that appropriate safeguards are in place to protect your personal data.

In the event we transfer your personal data around the ZEDRA Group, we do so on the basis of an International Data Transfer Agreement, which includes the European Commission's Standard Contractual Clauses, as set out in the Annex to Commission Decision 2010/87/EU ("EU SCCs") and the ICO's International Data Transfer Addendum to the EU SCCs ("UK Addendum").

Where we transfer your personal data to service providers, we ensure that the country in which they receive your personal data is the subject to an adequacy decision by the European Commission or UK Government. If this is not the case, we will use the appropriate legal instruments, which may include entering into appropriate EU SCCs and/or UK Addendum.

If you wish to obtain more information on how we transfer your personal data or wish to obtain a copy of the legal instruments implemented, contact the Data Protection Lead using the details provided below.

5. Retention of your data

We are required by law to retain certain data including identity and address details so that we can comply with the government's anti-money laundering controls. Will retain this and other personal data for a period of at least 6 years from the date of the file being archived (which is usually between 6–12 months after the matter closes) in order to exercise, establish or defend any legal claims against us. This may be longer if necessary, such as if a dispute arises and the personal data would be relevant to that dispute.

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6. Your rights as a data subject

You have certain legal rights (the "Rights") under applicable data protection law such as the right:

- To request confirmation as to whether we are processing personal data about you and, if so, to make a subject access request (a "SAR") for a copy of and information about the processing of that personal data;
- To request rectification of inaccurate or incomplete personal data concerning you;
- To require us to erase or restrict the processing of your personal data in certain circumstances;
- To request copies of any personal data which is being processed by automated means with your consent or under contract in a machine-readable format to be transferred to a third party;
- To object to the processing of personal data which is being processed to pursue the legitimate interests of the controller;
- Withdraw your consent at any time.

Please note that the Rights are not absolute, and ZEDRA may be legally entitled to refuse requests in certain circumstances.

7. Is it necessary for you to provide personal data to receive our services?

You are under no statutory or contractual obligation to provide data to ZEDRA. However, if you do not provide certain information, we will not be able to onboard you as a client and/or provide you with legal services.

8. Contact details

If you have any questions about the processing of your personal data, or you wish to exercise any of your rights, please contact our Data Protection Lead at:

By email – dataprotection@zedra.com

If you want to make a complaint about how we have handled your personal data, please contact the Data Protection Lead using the details provided above, who may investigate the matter and report back to you.

If you are not satisfied after our response or believe we are not using your personal data in line with the law, you also have the right to complain to the regulator. In the UK, the relevant regulator is the ICO and you can make your complaint via the ICO's website [here](#).

Please also see your rights to complain to the Legal Ombudsman as set out in ZEDRA Legal's Terms of Business.