

Greenaway Scott Limited

Privacy Policy

INTRODUCTION

Welcome to Greenaway Scott Limited's website privacy policy.

Greenaway Scott respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how Greenaway Scott collects and processes your personal data through the following means:

- (i) your use of this website, including any data you may provide through this website when you visit our website, when you sign up to our newsletter, or make an enquiry or request a quote through our website; or
- (ii) enter into a contract with us for our services.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Greenaway Scott Limited is the controller and responsible for your personal data (collectively referred to as "**Greenaway Scott**", "**we**", "**us**" or "**our**" in this privacy policy).

Greenaway Scott is regulated by the Solicitors Regulation Authority, and is a subsidiary company to GS Verde Group Limited ("**GS Verde Group**").

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Greenaway Scott Limited

Name of DPO: Rhian Osbourne

Email address: rosbourne@greenawayscott.com

Postal address: The Loft at the Maltings, East Tyndall Street, Cardiff, CF25 5EA

Telephone number: 02920 095 500

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes To The Privacy Policy And Your Duty To Inform Us Of Changes

We keep our privacy policy under regular review. This version was last updated on 27th January 2021. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you, to us, and payments we have made on your behalf, and other details of services you have purchased from us.
- MLR Data includes data you provide to us via the Credas App (details below).
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

- Usage Data includes information about how you use our website.
- Marketing and Communications Data includes your preferences in receiving marketing from us and any Group Companies, receiving newsletters from us and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you when you visit our website or request a quote for services (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We may however collect Special Category Data from you when we enter into a contract for services with you in the following instances:

- (i) when we collect MLR Data from you, we use an application called Credas which uses facial recognition technology. Therefore this biometric data is classified as Special Category Data, and further information will be contained in the Credas privacy policy which will be notified to you in the Credas App, and your consent for us to process this data, shall be collected at this point.
- (ii) when we provide you with our services under a contract, the nature of the services may require us to process certain Special Category Data about you, or any of the your employees, clients or third parties (dependant on the services provided).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you services). In this case, we may have to cancel or refuse to enter onto a contract for services with you, but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - subscribe to our service or publications;
 - request a newsletter or marketing to be sent to you;

- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [<https://www.greenawayscott.com/cookie-policy>] for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - (i) Technical Data from the following parties:
 - analytics providers such as Google based outside the UK (this only tells us how many people have visited our website but does not identify visitors);
 - (ii) Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as GoCardless based inside the UK.
 - (iii) MLR data from Credas Technologies Limited based inside the UK.
 - (iv) Identity and Contact Data from data brokers or aggregators Mailchimp and CRM Hubspot based inside the UK.
 - (v) Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
 - (vi) Identity and Contact Data from our Group Companies if they have had communication with you.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (i) Where we need to perform the contract we are about to enter into or have entered into with you.
- (ii) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (iii) Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before carrying out the following actions:

- (i) sending Group Company marketing communications to you via email or text message; and
- (ii) Data sharing with Group Companies.

We have processes and safeguards in place to accurately capture and record consent when you interact with us, and you have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) MLR	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

We may process personal data of your clients, employee or third parties during our performance of a contract with you. Such processing shall be carried out in accordance with our terms and conditions attached to our engagement letter confirming the services to be carried out.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

We only intend to share your personal data with our Group Companies for marketing purposes, or other third parties which are relative to the service we are providing you with, however as stated, we will always obtain your prior express consent for this.

Details of our data sharing and marketing can be found in our data sharing privacy policy which can be found here [<https://www.greenawayscott.com/cookie-policy>]

Opting out

You can ask us or third parties to stop sending you marketing messages at any time contacting us directly, or by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages (from us or Group Companies), this will not apply to personal data provided to us as a result of services purchased.

Withdrawal of consent will also be valid for any period prior to the withdrawal of consent.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [<https://www.greenawayscott.com/cookie-policy>].

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties:
 - GS Verde Group as part of our reporting obligations;

- Group Companies subject to your consent.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK unless we are conducting services on your behalf with a third party outside of the UK (acting as a processor).

Your MLR data shall be transferred outside of the UK in certain circumstances when you use the Cedas App. Further details can be found in the Cedas App privacy policy.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put 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.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law and in accordance with our obligations the SRA (our regulator) we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction

Data) and your full client file for six years after you cease being a client, and an additional one (1) year for our tax audit purposes (total of seven (7) years).

If you have made contact with us to enquire about our services, but not purchased any services from us, we shall destroy any personal data held every twenty four months since our last contact with you, unless you otherwise provide your consent for us to continue to process such data.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

If you make contact with us in respect of seeking employment, your data shall be processed in accordance with our candidate privacy policy.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact the DPO on the contact details listed at the beginning of this policy.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

The GS Verde Group is made up of the following different legal entities:

- (i) GS Verde Group Limited (“**GS Verde Group**”)
- (ii) Greenaway Scott
- (iii) Verde Corporate Finance Limited (“**Verde**”)
- (iv) DragonFly Communications Limited (“**DragonFly**”)
- (v) GS Business Transfers Limited (“**GS Transfers**”)
- (v) GS (Human Resources) Limited (“**GS HR**”)

(GS Verde Group, Verde, DragonFly, GS Transfers, and GS HR collectively referred to as “**Group Companies**”).

As we are a regulated company, we can only share your information (client and personal data) with your prior express consent, with the exception of limited information to GS Verde Group (in line with our business reporting obligations), or other Group Companies in the GS Verde Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services.

External Third Parties

- Service providers acting as processors or joint controllers based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK or internationally (dependant on the

Services) who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Mailchimp: privacy policy which details how Mailchimp use your data which we provided them with can be found here <https://mailchimp.com/legal/privacy/#3. Privacy for Contacts>
- GoCardless: privacy policy which details how GoCardless use your data can be found here <https://www.smartdebit.co.uk/privacy/>
- Credas Technologies: Credas shall provide you with their privacy policy prior to you providing your data to them directly.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.