

## KEY HAVEN PUBLICATIONS LIMITED (“KHP”).

### Privacy Notice - General Data Protection Regulation (“GDPR”)

Please read the following information carefully. This privacy notice contains information about the information collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who KHP shares this information with, the security mechanisms KHP has put in place to protect your data and how to contact in the event you need further information.

#### About Key Haven Publications Limited

*KHP* collects, uses and is responsible for personal information about you. Michael Venables QPM, Director of KHP and Data Protection Manager, is the ‘controller’ of this information for the purposes of the GDPR and the Data Protection Act 2018.

If you need to contact KHP about your data or the processing carried out you can use the contact details at the end of this document.

#### What does KHP do with your information?

##### Information collected

When carrying out our business of hosting seminars and publishing books, periodicals and other publications, KHP may collect some or all of the following personal information that you provide:

- a. personal details, including name, addresses, telephone numbers and other contact details, your firm or company and your professional qualifications
- b. details of any allergies from which you may suffer or special needs relevant to the provision of goods and services by KHP
- c. lifestyle and social circumstances
- d. goods and services you or your firm or company has purchased from KHP
- e. financial details
- f. education, training and employment details
- g. physical or mental health details
- h. racial or ethnic origin
- i. political opinions
- j. religious, philosophical or other beliefs
- k. trade union membership
- l. sex life or sexual orientation
- m. genetic data
- n. biometric data for the purpose of uniquely identifying a natural person
- o. criminal proceedings, outcomes and sentences, and related security measures

- p. other personal data relevant to the provision of goods and services provided by KHP in the course of its business.

### Information collected from other sources.

The same categories of information may also be obtained from third parties.

### How KHP uses your personal information: Purposes

KHP may use your personal information for the following purposes:

- i. to provide goods and services to you and its other clients, their firms and companies.
- ii. to keep accounting records and carry out office administration
- iii. to respond to potential complaints or make complaints
- iv. to promote and market to you goods and services provided by KHP and where appropriate, to promote and market to you goods and services provided by third parties where we consider you may wish to receive such advertising material. (We will not make our data available to such third parties.)
- v. to carry out anti-money laundering and terrorist financing checks
- vi. to respond to requests for references
- vii. when procuring goods and services
- viii. as required or permitted by law.

### Whether information has to be provided by you, and why

If you or your firm or company is purchasing goods or services from KHP, your personal information has to be provided, to enable us to provide the goods and services.

### The legal basis for processing your personal information

KHP relies on the following as the lawful bases on which it collects and uses your personal information:

- If you have consented to the processing of your personal information, then KHP may process your information for the Purposes set out above to the extent to which you have consented to its doing so.
- If you are or your firm or company is a customer or client of KHP, processing is necessary for the performance of a contract for delivery of goods or services.
- KHP is entitled by law to process the information where the processing is necessary for legal proceedings, legal advice, or otherwise for establishing, exercising or defending legal rights.
- In relation to information generally, KHP relies on its legitimate interest and/or the legitimate interests of a third party in carrying out the processing for the Purposes set out above.
- In certain circumstances processing may be necessary in order that KHP can comply with a legal obligation to which it is subject.

## Who will I share your personal information with?

It may be necessary to share your information with the following:

- data processors, such as directors, company secretary, staff, IT support staff, email providers, data storage providers and independent contractors
- our speakers and authors
- the staff and independent contractors of KHP
- regulatory authorities
- professional, educational and examining bodies
- professional advisers

KHP may be required to provide your information to the Financial Conduct Authority or the Information Commissioner's Office. In the case of the Information Commissioner's Office, there is a risk that your information may lawfully be disclosed by them for the purpose of any civil or criminal proceedings, without the consent of KHP or yourself.

KHP may also be required to disclose your information to the police or intelligence services, where required or permitted by law.

## Sources of information

The personal information KHP obtains may include information which has been obtained from:

- yourself
- persons who are consultants, employees or directors or independent contractors of any company of which you are a director employee
- persons who are consultants, employees or partners of any firm of which you are a partner or employee or consultant
- family and associates of the person whose personal information KHP is processing
- other regulatory authorities
- current, past or prospective employers
- professional, education and examining bodies
- data processors, such as directors, company secretary, staff, IT support staff, email providers, data storage providers and independent contractors
- public sources, such as the press, public registers and law reports.

## Transfer of your information outside the European Economic Area (EEA)

This privacy notice is of general application and as such it is not possible to state whether it will be necessary to transfer your information out of the EEA in any particular case or for a reference. However, if you reside or carry on business outside the EEA then it may be necessary to transfer some of your data to that country outside of the EEA for that purpose. If you are in a country outside the EEA or if the order you place comes from outside the EEA then it is inevitable that information will be transferred to those countries. If this applies to

you and you wish additional precautions to be taken in respect of your information please indicate this when providing initial instructions.

Some countries and organisations outside the EEA have been assessed by the European Commission and their data protection laws and procedures found to show adequate protection. Most do not. If your information has to be transferred outside the EEA, then it may not have the same protections and you may not have the same rights as you would within the EEA.

KHP will not otherwise transfer personal information outside the EEA except as necessary or desirable for providing goods or services or for any legal proceedings.

If you would like any further information please use the contact details at the end of this document.

### How long will KHP store your personal data?

KHP will normally store all your information:

- until at least 1 year after the expiry of any relevant limitation period (which will usually be at least 6 years but may be longer), from the date of the last goods or services provided, the date of the last payment received or the date on which all outstanding payments are written off, *whichever is the latest*. This is because it may be needed for potential legal proceedings. At this point any further retention will be reviewed and the data will be marked for deletion or marked for retention for a further period. The latter retention period is likely to occur only where the information is needed for legal proceedings, regulatory matters or active complaints. Deletion will be carried out (without further notice to you) as soon as reasonably practicable after the data is marked for deletion.
- Any information related to anti-money laundering checks will be retained until five years after the completion of the transaction or the end of the business relationship, whichever is the later;
- Names and contact details held for marketing purposes will be stored indefinitely or until KHP becomes aware or is informed that the individual has ceased to be a potential client.

### Consent

As explained above, I am relying on your explicit consent to process your information in certain cases. You provided this consent when you agreed that KHP would provide goods or services to you or to a company or firm with which you are connected.

You have the right to withdraw this consent at any time, but this will not affect the lawfulness of any processing activity KPH has carried out prior to you withdrawing your consent. However, where KPH also relies on other bases for processing your information, you may not be able to prevent processing of your data. For example, if you have ordered goods or services which have not been paid for, you may owe KPH money which KPH will be entitled to claim.

If there is an issue with the processing of your information, please contact Michael Venables QPM using the contact details below.

## Your Rights

Under the GDPR, you have a number of rights that you can exercise in certain circumstances. These are free of charge. In summary, you may have the right to:

- Ask for access to your personal information and other supplementary information;
- Ask for correction of mistakes in your data or to complete missing information I hold on you;
- Ask for your personal information to be erased, in certain circumstances;
- Receive a copy of the personal information you have provided to me or have this information sent to a third party. This will be provided to you or the third party in a structured, commonly used and machine readable format, e.g. a Word file;
- Object at any time to processing of your personal information for direct marketing;
- Object in certain other situations to the continued processing of your personal information;
- Restrict my processing of your personal information in certain circumstances;
- Request not to be the subject to automated decision-making which produces legal effects that concern you or affects you in a significant way.

If you want more information about your rights under the GDPR please see the Guidance from the Information Commissioners Office on [Individual's rights under the GDPR](#).

If you want to exercise any of these rights, please:

- Use the contact details at the end of this document;
- KPH may need to ask you to provide other information so that you can be identified;
- Please provide a contact address so that you can be contacted to request further information to verify your identity;
- Provide proof of your identity and address;
- State the right or rights that you wish to exercise.

KPH will normally respond to you within one month from when it receives your request.

## Marketing Emails

Please note if you wish to unsubscribe from any marketing emails that you have signed up for, you can do so by using the contact details at the end of this document. It may take up to 30 days for this to become effective.

### How to make a complaint?

The GDPR also gives you the right to lodge a complaint with the Information Commissioners' Office, if you are in the UK, or with the supervisory authority of the Member State where you work, normally live or where the alleged infringement of data protection laws occurred. The Information Commissioner's Office can be contacted at <http://ico.org.uk/concerns/>.

### Future Processing

KHP does not intend to process your personal information except for the reasons stated within this privacy notice. If this changes, this privacy notice will be amended and placed on the Old Square Tax Chambers website.

### Changes to this privacy notice

This privacy notice was published on May 24<sup>th</sup> 2018 and last updated on May 24<sup>th</sup> 2018.

KHP will continually review its privacy practices and may change this policy from time to time. When it does so, it will be placed on its website.

### Contact Details

If you have any questions about this privacy notice or the information KHP holds about you, please contact KHP through Michael Venables QPM, Director by emailing him at [mv.khpplc@khpplc.co.uk](mailto:mv.khpplc@khpplc.co.uk).