



Privacy Notice

1. General

- 1.1 Annabel London Limited trading as Annabel (“we”, “us” or “Annabel”) take the privacy of your information very seriously. Our Privacy Notice (together with our Terms and any other documents referred to in it) is designed to tell you, our client or the direct or indirect user of our services (the “Services”) about our practices regarding the collection, use and disclosure of personal and other information about you, your enterprise or your organisation that may be provided to us by you personally, or by email or telephone communication or collected through other means such as via our website (the “Site”) and any other digital product we provide.
- 1.2 This notice applies to ‘**personal data**’ provided to us by our clients. Personal data means any information relating to an identified or identifiable natural person, who may be identified, directly or indirectly by reference to an identifier such as a name, an identification number, location data, online information (e.g. an IP address) or to one or more factors relating to that person.
- 1.3 In this notice “you” refers to any individual whose personal data we hold or process (i.e: you may be a client, or you may be a family member, employee or otherwise connected to a client of ours and your data has been supplied to us).
- 1.4 This notice is governed by the EU General Data Protection Regulation (the “GDPR”) from 25 May 2018 and until 25 May 2018 is governed by the Data Protection Act 1998.
- 1.5 Unless otherwise stated, definitions used in this notice are the same as those used in our Client Terms.

2. Basis on which we process personal data

- 2.1 Personal data we hold about you will be processed either because:
- 2.1.1 the processing is necessary in pursuit of a “legitimate interest”, a legitimate interest in this context means a valid interest we have or a third party has in processing your personal data which is not overridden by your interests in data privacy and security
 - 2.1.2 the processing is necessary in order for us to comply with our obligations under a contract between you and us
 - 2.1.3 you have consented to the processing for the specific purposes described in this notice.

3. Personal data we collect

- 3.1 We may collect and process the following personal data about you:
- 3.1.1 your name, date of birth, residential address, contact address and telephone numbers, email address(es), photos and other personal information you provide to obtain further information about our Services or

as part of the process of discussing a potential Engagement or becoming a Client

- 3.1.2 information you provide to us and/or our consultants when becoming our client such as personal identification information including copies and/or online access to your passport, driving licence, national insurance number, banks statements, utility bills or other proof of address, legal documents (e.g. wills, birth and marriage certificates, LPA), relationship marketing programmes (e.g. frequent flyer membership), second home and rental property information, personal car information, household insurance (including inventories of household contents)
 - 3.1.3 payment information that we may collect or receive (if applicable)
 - 3.1.4 a record of any correspondence between you and us
 - 3.1.5 details of your visits to the Site, the resources and pages that you access
 - 3.1.6 any information we may require from you when you report a problem or complaint
 - 3.1.7 information relating to your professional or working life including details of your employer, your position and hours of work, your CV, Companies House information
 - 3.1.8 information about your education such as the school, university or college you attend, the courses being studied or the exams you are taking
 - 3.1.9 your financial information such as your salary and payroll information, details (which may include online access) of your outgoings, bills and expenses, tax returns (including HMRC UTR and Personal Tax Account Information), investment portfolio, pension records, copies of your bank statements, bank card data (if you have engaged us to provide you with financial support or assistance as part of our Services)
 - 3.1.10 security details such as IT passwords, keyholder/ alarm codes (if applicable)
 - 3.1.11 information about your health, including your medical records, details of your GP, hospital or other health related appointments and details of your medication (if any)
 - 3.1.12 information about your family members including your spouse, partner and children (if any) where you have given us that information to enable us to provide the Services
 - 3.1.13 where you are a family member, colleague or employee of our client, certain information (falling within one of the categories above) which our client may have supplied to us.
- 3.2 We only collect such information when you choose to supply it to us but please note there may be instances where, upon your request, we process your personal data which has been provided to us by a third party.



Examples of such personal data and where we obtain such data are as follows:

- we may collect some of the categories of personal data that are identified above if they have been supplied to us by a client that is connected to you (such as a spouse, partner, parent, sibling, colleague or employee) for the purpose of enabling us to provide the Services to that client; or
- we may collect some of the categories of personal data identified above from a third party if you have engaged us to liaise with third-parties on your behalf, for example, we may be engaged to liaise with your GP or medical practitioner for the purpose of arranging appointments or with a financial institution for the purpose of gathering investment evaluations and such third party may provide us with personal information that relates to you.

3.3 You do not have to supply any personal information to us but we may not be able to provide our Services in practice without providing data to us. You may withdraw our authority to process your personal data (or request that we restrict our processing – see clause 9) at any time (but we may not be able to fully perform our Services should you do so).

4. How we process your personal data

4.1 We will use your information to:

- 4.1.1 provide our Services to you, our client, and to those individuals connected to you (such as your partner, spouse, children and siblings)
- 4.1.2 provide information about our Services to you if you are a potential client
- 4.1.3 provide information about you to our Consultants, for the purpose of discussing, negotiating or agreeing an Engagement
- 4.1.4 assist in the administration of our Services
- 4.1.5 assist in making general improvements to our Services
- 4.1.6 carry out and administer any obligations arising from any agreements entered into between you and us
- 4.1.7 contact you and notify you about changes to our services or the services we offer, subject to the Privacy and Electronic Communications Regulations (except where you have asked us not to do this)
- 4.1.8 manage your client relationship with us (if any) and with our Consultants (if any) and provide you with client support
- 4.1.9 analyse how our Site is used and to identify trends
- 4.1.10 ensure that the content of the Site is presented in the most effective manner for you and for your device.



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5. Cookies

- 5.1 A cookie is a piece of data stored locally on your computer and contains information about your activities on the Internet. The information in a cookie does not contain any personally identifiable information you submit to our Site.
- 5.2 On our Site, we use cookies to track users' progress through the Site, allowing us to make improvements based on usage data. A cookie helps you get the best out of the Site and helps us to provide you with a more customised service.
- 5.3 Once you close your browser, our access to the cookie terminates. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. To change your browser settings you should go to your advanced preferences.
- 5.4 We are required to obtain your consent to use cookies. If you continue to use the Site having seen the notice on the Site then we assume you are happy for us to use cookies.
- 5.5 If you choose not to accept the cookies, this will not affect your access to the majority of information available on our Site.
- 5.6 An Internet Protocol (IP) address is a number assigned to your computer by your Internet Service Provider (ISP), so you can access the Internet. We may use your IP address to diagnose problems with our server, report aggregate information, and determine the fastest route for your computer to use in connecting to our Site, and to administer and improve the Site.

6. Data Retention

- 6.1 Our current data retention policy is to delete or destroy (to the extent we are able to) the personal data we hold about you in accordance with the following:

<i>Category of personal data</i>	<i>Length of retention</i>
Personal data (including special categories of personal data) processed in relation to a contract between you and us	7 years from either the end of the contract or the date you last used our Service, being the length of time following a breach of contract in which you are entitled to make a legal claim
Records relating to a client contracts or agreements or any supplier contracts or agreements	7 years from end of contract or agreement
Personal data held on marketing or business development records	3 years from the last date on which a data subject has interacted with us
Records relevant for tax purposes	8 years from the end of the tax year to which the records relate

- 6.2 For any category of personal data not specifically defined in this Notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data.
- 6.3 The retention periods stated in this Notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).
- 6.4 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.
- 6.5 If you wish to request that data we hold about you is amended or deleted, please refer to clause 9 below, which explains your privacy rights.

7. Sharing your information

- 7.1 We do not disclose any information you provide to any third parties other than as follows:
- 7.1.1 our consultants are self-employed and we will need to share your personal information with them, in order for them to provide the Services to you (but we will enter into an agreement with them to ensure that they process your data in accordance with this notice and your privacy rights are protected)
 - 7.1.2 where you have asked us to share your information with a third party as part of the performance of our Services
 - 7.1.3 where information such as email addresses is passed to our specialist IT team or other third party supplier who provide technical support or other services to assist us in the provision of our Services
 - 7.1.4 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime)
 - 7.1.5 in order to enforce any terms and conditions or agreements for our Services that may apply
 - 7.1.6 we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected
 - 7.1.7 to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.



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7.2 Other than as set out above, we shall not disclose any of your personal information unless you give us permission to do so. If we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.

8. Security

8.1 We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):

8.1.1 compliance with our IT and Security Guidelines (which are reviewed and updated as necessary)

8.1.2 when necessary, disposing of or deleting your data so it is done so securely

8.1.3 regularly backing up and encrypting all data we hold.

8.2 We will ensure that our employees and our Consultants are aware of their privacy and data security obligations through compliance with our IT and Security Guidelines. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and data security obligations.

8.3 This notice and our procedures for handling personal data will be reviewed as necessary.

8.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us by email; any transmission is at your own risk. Once we have received your information, we will use the strict procedures and security features referred to in this clause to try to prevent unauthorised access.

9. Your privacy rights

9.1 The GDPR gives you the following rights in respect of personal data we hold about you:

<i>The right to be informed</i>	You have a right to know about our personal data protection and data processing activities, details of which are contained in this notice.
<i>The right of access</i>	You can make what is known as a Subject Access Request ("SAR") to request information about the personal data we hold about you (free of charge, save for reasonable expenses for repeat requests). If you wish to make a SAR please contact us as described below.

<p><i>The right to correction</i></p>	<p>Please inform us if information we hold about you is incomplete or inaccurate in any way and we will update our records as soon as possible, but in any event within one month.</p> <p>We will take reasonable steps to communicate the change to any third parties to whom we have passed the same information.</p>
<p><i>The right to erasure (the 'right to be forgotten')</i></p>	<p>Please notify us if you no longer wish us to hold personal data about you (although in practice it is not possible to provide our Services without holding your personal data). Unless we have reasonable grounds to refuse the erasure, on receipt of such a request we will securely delete the personal data in question within one month. The data may continue to exist in certain backup, but we will take steps to ensure that it will not be accessible.</p> <p>We will communicate the erasure to any third parties to whom we have passed the same information.</p>
<p><i>The right to restrict processing</i></p>	<p>You can request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data.</p>
<p><i>The right to data portability</i></p>	<p>You have right to receive copies of personal data we hold about you in a commonly used and easily storable format (please let us know a format which suits you). You may also request that we transfer your personal data directly to third party (where technically possible).</p>
<p><i>The right to object</i></p>	<p>Unless we have overriding legitimate grounds for such processing, you may object to us using your personal data for direct marketing purposes (including profiling) or for research or statistical purposes. Please notify your objection to us and we will gladly cease such processing.</p>
<p><i>Right to withdraw consent</i></p>	<p>If we are relying on your consent as the basis on which we are processing your personal data, you have the right to withdraw your consent at any time. Even if you have not expressly given your consent to our processing, you also have the right to object (see above).</p>

9.2 All SARs and other requests or notifications in respect of your above rights must be sent to us in writing to us at 17A Althea Street, London, SW6 2RX or [help@annabel.co.uk].



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9.3 We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

10. Data Breaches

10.1 If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO) and follow the data breach procedure outlined in our IT and Security Guidelines.

10.2 If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

11. Other websites

11.1 Our Site may contain links and references to other websites. Please be aware that this notice does not apply to those websites.

11.2 We cannot be responsible for the privacy policies and practices of sites that are not operated by us, even if you access them via the Site and/or any other service that is operated by us. We recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

11.3 In addition, if you accessed our Site via a third party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

12. Transferring your information outside Europe

12.1 We will not transfer any data in a systematic way outside of the EEA but there may be circumstances in which certain personal information is transferred outside of the EEA, in particular:

12.1.1 we may communicate with individuals or organisations outside of the EEA in delivering our services, those communications may include personal information (such as contact information), for instance if we are booking a trip outside the EEA

12.1.2 we may have certain third party service suppliers who are based outside the EEA or who store data outside of the EEA

12.1.3 if you communicate with us while you are outside of the EEA there may be some data transfer to you or your device

12.1.4 from time to time your information may be stored in devices which are used by our staff outside of the EEA (but staff will be subject to our IT and Security Guidelines)

12.2 If we transfer your information outside of the EEA, and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate



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safeguards and your privacy rights will continue to be enforceable against us as outlined in this notice.

13. Notification of changes to the contents of this notice

If we update or change our policy in any way, we will provide our clients with an updated policy. We will also post details of any changes to our policy on the Site to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

14. Policy towards children

Our policy is not to intentionally or knowingly collect, process, maintain or use personal information from any individual under the age of 13 unless we have received consent to do so from the child's parent(s).

15. Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so via the following email address: 17A Althea Street, London, SW6 2RX or [help@annabel.co.uk].

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner's Office by visiting <http://www.ico.org.uk/> for further assistance.