# **Brevis Privacy Policy**

## Intended purposes for processing

In order to provide you with legal services and for the administration of our files and records, we will be using and storing your personal data. Any physical paperwork we receive will be scanned and retained in an electronic filing system and the original document will be either (i) physically stored where the original paperwork is required or (ii) securely disposed where it is not. Personal data includes information that identifies you such as your name, address, job title and contact information. In some cases, where it is necessary, we may also process special categories of personal data, such as your health records and/or criminal conviction and offence records. Whenever we are processing special categories of personal data, and/or criminal conviction and offences records, we will only use that data to deliver the services you have instructed us to provide.

#### Brevis right to process

We may be required to process your personal data in order to comply with our legal obligations under legislation such as the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, the Criminal Finances Act 2017, the Foreign Account Tax Compliance Act 2010 (for clients with US 'person' status) and under common law. We may, on occasion, be required to share your personal data with the relevant authorities. We may also process your personal data on the basis that we have your clear consent and in some instances we may have a legitimate interest in processing your personal data.

## **Recipients of your personal data**

We may be required to share your personal data with other organisations which may include:

- The Solicitors Regulation Authority, the Information Commissioner's Office (ICO) and organisations involved with the preparation, assessment and certification of quality standards for which our firm is seeking or maintaining accreditation.
- Our firm's 'data processors' who are contractors from whom we obtain operational services including IT, message-taking, typing and secretarial support, costs draftsmen, secure document storage and shredding, printing companies and data entry companies.
- Providers of insurance, financial and banking services to you and/or to our firm.
- Other 'data controllers' that provide professional services such as other solicitors and accountants.
- HMRC, HM Courts & Tribunals Service, HM Land Registry, Councils and other government bodies.
- Other individuals and organisations as agreed with you based on your instruction to us.

## Data Retention and Erasure

To comply with SRA, Anti-Money Laundering and other legislation, and to ensure the firm and its regulator has access to data in the event of enquiries or legal proceedings, your file is retained for a period of seven years after our service to you has completed, unless there is a compelling reason to retain it for a further period of three years, at which point it will be reviewed again. We will not erase or restrict the processing of your personal data during the period in which we have a legal obligation to retain that data under the applicable Act, Regulations or in common law. If you consented to our using your personal data for marketing purposes we will erase the data used for that purpose if and when you inform us that you wish to withdraw your consent.

#### Your rights in relation to your personal data

You have the right to access your personal data. **If you would like a copy of your personal data, please contact us via email** (help@brevis.co.uk) or by post. We will need to verify your identity before responding to your request. Normally we make no charge for doing this and will endeavour to send it to you within 1 month of receipt of your request. **If you have any concerns relating to your data, please reach out to us to let us know** – if we're unable to resolve your concerns then you can make a complaint to the public body, the ICO. You can make a complaint to the ICO via their website, www.ico.org.uk or you can contact them via telephone for guidance on 0303 123 1113.

#### <u>Security</u>

We are committed to ensuring that all information we hold about you is secure. In order to prevent unauthorised access or disclosure we have implemented appropriate physical, electronic and managerial procedures to safeguard and protect your information.

#### Personal data concerning a third party

You should **only give us personal data about someone else with their permission**. Where you provide us with personal data about someone else, or someone discloses to us personal data about you, it may be added to the personal data we already hold and may be used in the ways described in this Privacy Notice.

All of the above are compliant with UK Data Protection Laws.

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# Brevis Cookie Policy

#### What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. This helps website owners and marketing departments provide you with the information that they believe will be most of interest to you, based on what they know of your interests and browsing history. You can find more information at:

www.allaboutcookies.org www.aboutcookies.org

#### How Brevis uses cookies :

Cookies allow us to provide features in our site, recognise devices and track how our visitors use brevis.co.uk. We use 3 types of cookie:

<u>Necessary</u>: These cookies are essential when you navigate our website content or use the basic website features, and so are required for the site to function correctly.

You can identify our cookies as they all begin with 'brevis\_' such as 'brevis\_cookie\_choices'. These are all necessary for the function of our site and so cannot be switched off. You may also see cookies beginning with 'wp\_' or 'ARRAAffinity'. These are also required for the proper function of our site and are only used to improve its performance and your experience of using it.

<u>Statistics and Marketing:</u> Statistics cookies allow us to measure visits to brevis.co.uk, how visitors use it, and learn from this information to help with future improvements to the site and to our services.

Marketing cookies allow us to measure the results of the advertising we post on external websites, to target and obtain more relevant traffic to our site, and to understanding how effective our marketing campaigns are.

When you first visit the site, you will be given the opportunity to select which types of cookies you are happy for us to use. These selections will then be stored for up to 30 days or until you clear your browser's history, when you will be asked again.

If you have previously visited brevis.co.uk and entered your cookie choices, you can review your choices by clicking the 'Review my cookie choices' option at the bottom of the home page of brevis.co.uk.

Statistics and Marketing cookies are generally set by organisations other than Brevis and are often known as 'third-party' cookies. These may be used to track internet activity after a visitor has left our site.

We set a number of third-party cookies on brevis.co.uk to analyse visitors browsing of our website, help with future improvements to the site and to understand how effective our marketing campaigns are. We may also send advertising messages to people we know have visited our site and who we think may be interested in our services.

You can find details of the third-party cookies we use with or on our site in the list following.

<u>Bit.ly:</u> If we shorten our site URLs, for example on Twitter or Facebook or on shareable links on our site, we may use services such as bit.ly to do so. Our site then works with this service to rebrand our URLs to a 'brevis.co.uk/xxxxx' link. Bit.ly then provide us with anonymised, aggregated statistics relating to the use of our shortened URL, for example by telling us how many times it has been clicked on. For more information on bit.ly please see the Bitly Privacy Policy.

<u>Google:</u> We currently use Google Analytics to measure and analyse visitor information related to our web site. This information is collected using several cookies including those beginning with '\_utma', '\_utmc', '\_utmb', '\_utmz'. We also use Google Ads to target potential clients and to measure the performance of our advertising. This information is collected using several cookies including those beginning with '\_gac', '\_gcl', \_gads'. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. For more information please see the Google Privacy Policy.

<u>Hotjar:</u> We use Hotjar to monitor how our website is being used so we can make improvements. Our use of Hotjar requires us to pass to Hotjar your IP address (but no other information). Hotjar uses this information to prepare site usage reports for us. This information is collected using several cookies including those beginning with '\_hj'. For more information please see the Hotjar Privacy Policy.

Facebook & Instagram (AKA Meta): When someone visits our site from Facebook or engages with our content, we use a Facebook Pixel to collect details of their behaviour patterns. This data is used to make sure that our Facebook adverts are shown to the right people, to measure the results of our adverts and to drive more relevant traffic to our site. This information is collected using several cookies including those beginning with '\_fr', '\_fbp', '\_wd' and '\_datr'. For more information please see the Meta Privacy Policy.

<u>Trustpilot:</u> We offer insight into the quality of our service through a link to the Trustpilot website which shows reviews and ratings from Brevis clients. Trustpilot use cookies to anonymously give us aggregated statistics on views and clicks of those reviews. For more information please see the Trustpilot Privacy Policy.

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