



Solicitors and Family Office

PRIVACY NOTICE

RSL-LAW understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our legal obligations as solicitors and your rights under the law
Information

1. About Us

RSL-LAW is the trading name of Red Square (London) Ltd, registered in England, company registration number 07975086.

Our registered address and main trading address is 78 Pall Mall, London, SW1Y 5ES. Our office contact telephone number is (+44) (0)207 060 5333 and our general office e-mail is info@rsl-law.co.uk.

We are regulated by the Solicitors Regulation Authority, registration number 591917.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in para 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b. The right to access the personal data we hold about you. Part 10 will tell you how to do that.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d. The right to be forgotten, i.e. the right, within the bounds of regulation covering retention of legal information, to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact using the details in Part 11 to find out more.

- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h. Rights relating to automated decision-making and profiling. We do not use your personal data in this way]

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office (ico.org.uk) or, if a UK resident, your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this will vary according to your relationship with us):

- Full Name; Date of birth; Gender; Address; Email address; Telephone number(s);
- Similar data about your immediate family;
- Business name(s) and your relationship with those businesses;
- Details of your financial circumstance and related financial accounts;
- Records of financial transactions with us.

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for the conduct of your relationship with us; because you have consented to our use of your personal data; or because it is in our legitimate business interests to use it.

6. How do You Use My Personal Data

Your personal data may be used for one or more of the following purposes:

- conducting the matters on which you have instructed us and which constitute a contract between us;
- carrying out any anti-money laundering ('**AML**') checks that may be necessary;
- supplying you by email and/or post with information about legal or other subjects that may be of interest to you, for example changes in regulations, and more general marketing material that you have consented to receive; you may opt-out of receiving this kind of information at any time by notifying us.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- in accordance with SRA regulations, information relevant to legal matters will be kept for a period of six years, dating from the date the information was received or created;
- information in respect of accountancy matters will be kept for a similar period in accordance with HMRC regulations;
- other personal information not connected with a legal requirement to retain personal data will be kept for a similar period unless you request us to destroy it.

8. How and Where Do You Store or Transfer My Personal Data?

Until the United Kingdom leaves the European Union ('EU') we will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law. After the United Kingdom leaves the EU we intend to store your personal data only within the UK, which will maintain the full protection under the GDPR..

Unless we have your specific instructions or consent otherwise, we will only transfer your personal data within the EEA.

With your specific consent and/or instructions, we may transfer some or all of your personal data to countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. In those cases we will take such additional steps as are possible in order to ensure that your personal data is treated just as safely and securely as it would be within the UK.

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data we take a number of important measures, including but not limited to the following:

- hard-copy information is kept to a minimum; hard copy files are kept in secured cabinets in our main office, which is locked when unoccupied and is located in a building with full out of hours access security alarms, cctv surveillance and manned reception during office hours;
- all closed hard-copy files are stored in a secure commercial storage facility;
- as much data as possible is kept in electronic form;
- electronic data is kept on secured remote databases. ("in the cloud"), access is via encrypted links; access is limited to RSL-LAW working staff with very strong password protection;
- no RSL-LAW data is stored on personal workstations or laptops, which are all equipped with state-of-the-art firewalls and software to prevent illegal access or attack;
- all RSL-LAW data is backed up daily on a secure 256-bit encrypted link to an off-site data centre in UK on which our data is maintained in a protected area to which only our IT support function has access.

9. Do You Share My Personal Data?

In the course of conducting your legal and other matters we may be required to share some or all of your personal data with other parties to the matter or to comply with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request". All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11

There is not normally any charge for a subject access request. However, if your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, our aim is to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Please mark all correspondence

'For the attention of the Compliance Officer for Finance and Administration'

E-mail address: info@rsl-law.co.uk

Telephone number: **0207 060 5333**

Postal Address: **RSL-LAW, 78 Pall Mall, London, SW1Y 5ES.**

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our web site www.rsl-law.co.uk.