





# Rollings Butt LLP - Privacy Statement

### Introduction

Rollings Butt LLP ("RB", "we", "us", or "our") is committed to protecting personal data. This privacy statement sets out how RB uses and protects any information that you provide to us, and describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

Personal data is any information relating to an identified or identifiable living person. RB processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data. To find out more about our specific processing activities, please go to the relevant sections of this statement.

## How we collect your personal data

We collect personal data about our clients and contacts to help us run our business effectively, to manage our relationship with you and to develop potential business leads. We store the data in a Client Relationship Management (CRM) system.

The types of data we collect, and process can vary, it may include:

- Your name and job title
- Company name
- Email address
- Business telephone numbers
- Your interests, so we can invite you to events we think you will be interested in
- People at RB that you have had direct contact with
- Details of how we have engaged with you

We collect this data from you where you have given us a business card or have corresponded with us by email or other means.

# How we use your personal data and the basis for processing

We process your personal data for the following purposes:

- To set up your CRM profile which enables us to manage our interaction with you to provide business opportunities
- To enable us to send you updates with details of our services or other information we think you
  may find interesting
- To occasionally contact you for your views on our services

We believe that we have a legitimate interest in using your data for these purposes and believe that the risks posed to you are proportionate and appropriate as against our own interests.

Michael David Rollings and Steven Edward Butt are licenced to act in the UK as insolvency practitioners by the Insolvency Practitioners Association.

Where acting as administrators, liquidators or receivers, our insolvency practitioners act as agents of the relevant company and without personal liability.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you updates regarding the firm and our work which we think you may find interesting if you tell us that you wish this to happen.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

### When and how we share personal data and locations of processing

We will only share personal data with others when we are legally permitted to do so. This will include third party organisations that provide applications/functionality, data processing, IT or CRM services to us.

We use third parties to support us in providing our services and to help provide, run and manage our internal IT system including but not limited to providers of information technology, cloud based software, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres in the UK and around the world, including but not limited to the United States of America, and personal data may be stored in any one of them.

- Third party organisations that otherwise assist us in providing goods, services or information
- Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

## Data controller and contact information

The data controller is Rollings Butt LLP (the limited liability partnership registered in England under registration no. OC348050 and with its registration address at 6 Snow Hill, London, EC1A 2AY If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Rollings Butt LLP 6 Snow Hill London EC1A 2AY

Email: data.privacy@rollingsbutt.com

### Individuals' rights and how to exercise them

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. Where we decide how and why personal data is processed, we are a data controller and include further information about the rights that individuals have and how to exercise them below.

### Access to personal data

You have a right of access to personal data held by us as a data controller. This right may be exercised by emailing us at data.privacy@rollingsbutt.com We may charge for a request for access in

accordance with applicable law. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (currently 40 days).

### Amendment of personal data

To update personal data submitted to us, you may email us at data.privacy@rollingsbutt.com

When we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

### Withdrawal of consent

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). To withdraw consent to our processing of your personal data please write to us at the address at the top of this statement or email us at <a href="mailto:data.privacy@rollingsbutt.com">data.privacy@rollingsbutt.com</a>.

#### Other data subject rights

This privacy statement is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to removal/deletion, to restrict or object to our processing of personal data and the right to data portability. Some of these rights will only be available from 25 May 2018.

If you wish to exercise any of these rights, please write to us at the address at the top of this statement send an email to <a href="mailto:data.privacy@rollingsbutt.com">data.privacy@rollingsbutt.com</a>.

## Changes to this privacy statement

We recognise that transparency is an ongoing responsibility, so we will keep this privacy statement under regular review.

This privacy statement was last updated on 17 May 2018.

## **Use of Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. We do not capture data using Cookies. If this situation changes, we will re-issue our Privacy Statement to state such changes.

## Complaints

We trust that you will never have a need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to <a href="mailto:data.privacy@rollingsbutt.com">data.privacy@rollingsbutt.com</a>. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). Further information on your rights and how to complain to the ICO, please refer to the ICO website, <a href="www.ico.org.uk">www.ico.org.uk</a>