

PRIVACY NOTICE

1. Introduction

Privacy & Legal Management Consultants Limited ("PLMC") respects your concerns about privacy.

This Privacy Notice applies to the Personal Data that we collect and handle for the purposes of maintaining and providing our services. For the purposes of this Privacy Notice, "Personal Data" means information relating to a living individual; or an individual who has been deceased for less than thirty years who can be identified from that information.

2. What data does PLMC collect?

We collect information from you depending on how you interact with us and our services. This information will be used for the sole purpose for which the information was provided to us and may include:

- a. Your name and date of birth;
- b. Contact details, such as your address, email address, and phone number;
- c. Government identifiers, such as your Taxpayer Registration Number, and National Insurance Number;
- d. Transactional information, such as your bank account information;
- e. Details on services received from us; or
- f. Communication exchanges or feedback that you provide to us.

3. Who collects data?

Personal Data is collected by our staff.

Personal Data is also collected by our website (such as your name, telephone number and email address) whenever you contact us through that forum.

4. How do we use the data?

We use Personal Data:

- a. to verify identities;
- b. to communicate with clients and employees;
- c. to process and fulfil transactions;

- d. for payroll purposes;
- e. to allow access to our services;
- f. to fulfil legislative and regulatory requirements;
- g. to provide you with information on our services;
- h. improve PLMC's services; and
- i. improve overall client experience and ensure compliance with our legal and regulatory obligations.

5. What are our legal bases for processing your Personal Data?

The lawful bases we rely on for processing this information are where we have:

a. Your Consent

Where you have provided us with your consent to process your personal data, you are free to remove your consent at any time. You can do so by contacting our Data Protection Officer whose details are listed herein.

b. A Contractual Obligation

We may process your personal data where we provide you with any legal services under a retainer agreement, or where you have consulted us about a particular matter for which you are seeking legal advice or action taken on your behalf.

c. A Legal Obligation

Where you engage us to provide legal services, we may process your personal data where we are required to comply with any law.

d. A Vital Interest

We may process your personal data where it is necessary to protect your vital interests. For example, where we need to use or disclose your personal data in order for you to obtain emergency medical care.

e. A Legitimate Interest

We may process your personal data where it is necessary for us to pursue our legitimate interests as a business for the following purposes:

- i. to enter into and perform a contract that we have with you;
- ii. to prevent fraud and other criminal activities; or
- iii. to establish, exercise or defend our legal rights.

f. To Perform A Public Task

We may process your personal data in order to perform any function conferred upon us by any enactment or any functions of a public nature exercised in the public interest.

6. How do we share and disclose data to third parties?

We share your Personal Data with your consent or to complete any transaction or provide any service you have requested or authorized.

Depending on the service provided, data may be shared with third parties when it is necessary to provide services to clients and/or for other legitimate interests. Third parties include external counsel, consultants, and other professionals not employed by PMLC.

7. Security

We use appropriate technical and organizational security measures to protect any information we hold in our records from loss, misuse and unauthorized access, disclosure, alteration, and destruction. This is done to protect the confidentiality and integrity of data.

8. Data Retention

Personal Data shall be kept in a form which permits identification of individuals only so long as necessary for the fulfilment of the purpose(s) for which it was collected or for compatible further processing in accordance with this Notice.

We may retain Personal Data where required by law or where we have an ongoing legitimate business need to do so. For example, we may retain such data to provide a service requested, to comply with applicable legal, tax or accounting requirements, or where necessary for fraud prevention, dispute resolution, enforcement of our contracts and terms, or for safety reasons.

9. Your Rights and Choice

You have rights under the Data Protection Act, 2020 in relation to your Personal Data. These include:

- **a. Right to be informed** you have the right to be informed of how your personal data are being processed by PLMC.
- **b. Right of access** you have the right to be provided with information concerning personal data that is being processed by PLMC, as well as to be provided with a copy of such personal data.

- **c. Right to consent** you have the right to consent to the processing of personal data. This also includes the right to withdrawn consent at any time.
- **d. Right to rectification** you have the right to have any inaccuracies related to your personal data rectified.
- **e. Right to object** you have the right to object to certain processing, upon which the processing shall cease. You may only object to processing where:
 - i. the processing of your personal data is likely to cause to you substantial and unwarranted damage or distress;
 - ii. your personal data is incomplete or irrelevant, having regard to the purposes for which the personal data is, or is to be, processed;
 - iii. the processing of your personal data is prohibited under any law; or
 - iv. your personal data has been retained longer than the period of time for which it may be retained under any law.
- **f. Right to data portability** you have the right to require your data be provided to them in an intelligible form; or to have your personal data transmitted to another data controller in a structured, commonly used, and machine-readable format.
- **g. Rights in relation to automated decision-making** you have the right to not be subject to a decision based solely on automated processing, including profiling, which may significantly affect you.

If you wish to exercise any of the rights set out above, please use our <u>Data Subject</u> <u>Access Request Form</u>, or contact our Data Protection Officer at <u>dpo@privacymgmt.org</u>.

10. Changes to the Privacy Notice

We are constantly trying to improve our services so we may need to change this Privacy Notice from time to time. We will alert you to material changes by, for example, sending you an email (if you have registered your email details with us) when we are required to do so by the Data Protection Act.

You can see when this Privacy Notice was last updated by checking the date at the top of this page. You are responsible for periodically reviewing this Privacy Notice.

11.Contact Us

If you have questions, requests or concerns regarding your privacy and rights, please contact our Data Protection Officer at Privacy & Legal Management Consultants Limited, Suite # 2, 24 Cargill Avenue, by email at <u>dpo@privacymgmt.org</u>, or by telephone at (876) 561-3713.

END OF NOTICE.

Date of Last Update: June 2024