

# Privacy Policy

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Bluefriars Limited (and where appropriate one of its group companies) ("we", "our", "us") values your privacy and we are committed to protecting your personal information when you visit this website. This Privacy Policy relates to our use of any personal information you provide through this website. Whenever you provide personal information through our website, we are legally obliged to use your information in line with all legislation and regulation concerning the protection of personal information within the United Kingdom (UK) and the European Union (UKEU/EEA). In continuing to use our website, you provide your acceptance and agreement to this notice.

## What data do we collect?

When you submit an enquiry for Bluefriars' services, we may ask for personal information. This may consist of your name, email address, postal address, and telephone number and CV (if applicable). If you choose not to provide such information, we may not be able to respond to you or provide information about our services.

## How is this information used?

We use your personal information to contact you about an enquiry you have submitted through this website.

## How and where is my personal information shared?

We will keep your information confidential except where disclosure is required by law. Personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings—any use of sensitive personal data is strictly controlled in accordance with Bluefriars privacy policy.

## Sensitive personal data

As explained in our Privacy Notice there are certain categories of personal data (special category data) that are sensitive by nature. These categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health.

Depending on the nature of the products and services that you engage us for, we may need to obtain your sensitive personal data - particularly in relation to health. In the case where we need to process special category (sensitive) data as described above, we will inform you at the time and seek your consent via our servicing agreement.

However, we may also disclose general statistical information regarding your use of our website in the following circumstances: 1) to prospective commercial partners; 2) in the event that we buy or sell any business or asset; 3) if Bluefriars Limited or substantially all of its assets are acquired by a third party; or 4) if required to do so by any applicable law, regulatory or legal obligation to enforce or apply our terms of use agreement or any other agreement, or if we believe such action is necessary to protect and defend the rights, property or personal safety of Bluefriars Limited's employees, consultants, the site or its visitors.

## Where is my information stored?

Information that you submit through this website is sent to a computer located in the UK. This is necessary to process the information and to send you the information you have requested. Information submitted by you may be transferred by us to our other offices and other reputable third party organisations which may be situated outside the UK/EEA European Economic Area. By

submitting your personal data through this website, you agree to this transfer, storage and processing. We will hold your personal information on our systems for such time as is necessary for the relevant service, and/or for as long as is necessary to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

There are restrictions on international transfers of personal data. No data may be transferred outside of the UK/EEA without first discussing it with Bluefriars compliance. Specific consent from data subjects must be obtained prior to transferring their data outside the UK/EEA, and Bluefriars compliance must assess the risks to data subjects that are involved.

### **Can I find out what personal information is held about me?**

Under the General Data Protection Regulation (GDPR) and the UK Data Protection Act (2018/1998), you have the right to request a copy of the personal information we hold about you and to have any errors corrected. We will use reasonable endeavours to supply, correct or delete personal information about you and held by us.

We may charge a fee for information requests and will ask you to provide proof of identity. Please address any requests regarding this to our registered office address. Under the Data Protection Act 1998 (and the provisions of the GDPR 2018), individuals are entitled, subject to certain exceptions, to request access to information held about them.

If we receive a subject access request, we will refer that request immediately to the the Bluefriars Compliance team. The Bluefriars Compliance team may ask you to help us comply with those requests in accordance with article 12, 13 and 14 of the GDPR 2018. There are some exceptions which means Bluefriars cannot legally provide such information. Should there be a security breach, this will be managed by the Bluefriars Compliance team, in accordance with the appropriate regulatory framework and rules and in accordance with articles 33 and 34 of the GDPR 2018 and in accordance with Bluefriars Privacy Policy.

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