Notification for Email Contacts

Cluttons LLP on behalf of its subsidiary companies, associated undertakings and licensees is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (GDPR), the data controller is Cluttons LLP of Portman House, 2 Portman Street, London W1H 6DU.

NATURE OF DATA

Your email address is automatically included as part of any email we receive from you and in storing your email we inevitably store this data; any other personal data included in the email will also be stored. Our email software may automatically extract your email address and our staff may add your name and possibly phone number, job title and place of employment.

SOURCE OF INFORMATION

We may receive and process information about you from:

- yourself (data you provide)
- other email correspondents

LAWFUL BASIS

Our lawful basis for processing this data is

• our legitimate interest to communicate via email in the normal course of business

The consequences for you if we are unable to process this data would be:

• we would not be able to receive email from or send email to you

RETENTION

Most email correspondence will be retained for 1 year unless you request, we delete it beforehand, however depending on the nature of the communication we may retain it for up to 7 years to meet our legal obligations (for example under the Finance Act 2008).

RECIPIENTS

To the extent that is necessary to meet our legitimate interest your data may be shared with:

- our software and IT service providers
- other email correspondents

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

• to communicate with you via email

DISCLOSURE OF YOUR INFORMATION

Where we may occasionally be required to disclose certain information to additional third parties, we will disclose data only when and to the extent that we have a legal obligation to do so.

Such third parties may include:

- law enforcement authorities
- courts, tribunals or other judicial bodies

TRANSFER OUTSIDE THE EEA

We do not transfer your data outside the European Economic Area.

YOUR RIGHTS

You have the following qualified rights with regard to your personal data:

- Access you may request we provide you with the data we hold
- Rectification you may request we correct any inaccurate data
- Erasure you may request we erase your data
- Restriction you may request we stop processing your data but retain it
- Objection you may object to us processing your data
- Portability you may request we provide you or a nominated party with your data in a commonly used, structured and machine-readable format

You can exercise your rights at any time by contacting us at <u>cs@cluttons.com</u>

You also have the right to lodge a complaint with the <u>Information Commissioner's Office</u> or any other <u>European</u> <u>Supervisory Authority</u>.

CHANGES TO THIS NOTIFICATION

Any changes we may make to this notification in the future will be posted on this page and where appropriate notified to you by e-mail.

CONTACT

Questions, comments and requests regarding this notification are welcomed and should be addressed to: cs@cluttons.com