

## **Privacy Policy**

Justice Roche understands that your privacy is important to you and that you care about how your personal data is used. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

### **1. 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.

### **2. 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 Policy 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 10.
- b) The right to access the personal data we hold about you. Part 8 will tell you how to do this.
- 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 9 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 9 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 9.

Further information about your rights can also be obtained from the Information Commissioner's Office or 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.

### **3. What Data Do We Collect:**

Depending upon our work for you as a customer, we may collect some or all of the following personal data Name, Address, Email address, Telephone number, Business name, Payment method (but not actual card details)

### **4. How Do You Use My Personal Data:**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes: Supplying our services to you. Your personal details are required in order for us to enter into a contract with you. Communicating with you. This may include responding to emails or calls from you. Supplying you with information by email. With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity decline this. Please contact us using the details provided in Part 10 if you wish to do this.

### **5. 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.

### **6. Do You Share My Personal Data:**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions: We may share some of your personal data with trusted third parties in order to fulfil delivery of the products and services you have engaged us for. However, we provide only the information they need to perform their specific services. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

### **7. How Can I Control My Personal Data:**

7.1 In addition to your rights under the GDPR, set out in Part 4, when you submit personal data, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes.

7.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference

Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

#### **8. 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 9. There is not normally any charge for a subject access request. 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 28 days and, in any case, not more than one month of receiving it. Normally, we aim 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.

#### **9. How Do I Contact You:**

To contact us about anything to do with your personal data and data protection, please use the following details: Email address: [info@justice-roche.com](mailto:info@justice-roche.com) Telephone number: 01789 332 091 Postal Address: Justice Roche, Pure Offices, Tachbrook Park, Leamington Spa CV34 6WE.

#### **10. Changes to this Privacy Policy:**

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 immediately updated on our Privacy Policy which is available at – [www.justice-roche.com/privacy.pdf](http://www.justice-roche.com/privacy.pdf)