

# S A F A | HOLMES

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## PRIVACY NOTICE

This privacy policy is served by SAFA HOLMES (UK) LIMITED (we/us/our) under the website: <https://Safa-Holmes.com/>

### 1. Important information and who we are

#### **Purpose of this Privacy Notice**

This privacy notice aims to inform how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you (personal information) and information that could not.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the Law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The Law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

#### **Controller**

We are the data controller to our website and are responsible for your personal data.

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us at [Privacy@Safa-Holmes.com](mailto:Privacy@Safa-Holmes.com)

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## 2. The data we process

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

- **Identity Data** includes information such as first name, last name, title, date of birth, gender and other identifiers that you may have provided at some time.
- **Contact Data** includes contact address, email address, telephone numbers and any other information you have given to us for communication or meeting.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services including the full Uniform Resource Locators (URL), clickstream to, through and from our sites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to contact us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us, your communication preferences, and responses and actions in relation to your use of our services.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated Data may be derived from your personal data but is not considered personal data in Law as this data does not directly or indirectly reveal your identity.

### Special personal information

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### The bases on which we process information about you

The Law requires us to determine under which of six defined bases, we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by Law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

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### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact Data by filling in an online form or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- seek to explore how we might work together;
- ask us to supply you with services;
- apply for a role with us;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Third parties or publicly available sources. We may receive Identity and Contact Data about you from public sources, including Companies House and the Electoral Register.

### 4. How we use your personal data

We will only use your personal data when the Law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To consider your application for a role with us.
- Where we need to perform a contract, we are discussing entering into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

#### **Purposes for which we will use your personal data**

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data on more than one lawful ground depending on the specific purpose for which we are using your data.

Please email us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

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## **Cookies**

A cookie is a small file of letters and numbers that, with your agreement, we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

### **We use the following cookies:**

#### **Analytical/performance**

They allow us to recognise and count the number of visitors to our website and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

#### **Functionality**

These are used to recognise you when you return to our website, so for example, you are not asked to consent to us using cookies each time you visit us.

#### **Targeting and remarketing**

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and services more relevant to your interests.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

These cookies are likely to be analytical/performance cookies or targeting cookies.

We provide more information about the cookies we use in our cookie policy.

#### **Change of purpose**

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us on [Privacy@Safa-Holmes.com](mailto:Privacy@Safa-Holmes.com)

If we need to use your personal data for an unrelated purpose, we will notify you, and we will explain the legal basis, which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by Law.

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## 5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Service providers acting as processors based in the EU or US who provide IT and system administration services to us.
- Professional advisers acting as data processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the Law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

Many of our external third-party service providers (for example Amazon Web Services and GoogleApps) are based outside the European Economic Area (EEA), so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

Where we use certain service providers, we may use specific contracts approved by the European Commission, which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

## 7. Data security

We have put in place advanced security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us.

## 9. Access to your personal information

At any time, you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website, you should contact us to make that request.

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights).

This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Removal of your information

If you wish us to remove personally identifiable information from our website, you should contact us to make your request. This may limit the service we can provide to you.

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## 10. Changes to our Privacy Notice

We may as necessary update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website.

If you have any question regarding our privacy policy, please contact us.

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy

This version was first published on December 5, 2020, and historic versions can be obtained by contacting us.

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 11. Glossary

### **Lawful basis**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by Law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

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## 12. Other matters

### Use of site by children

Our website is not intended for children, and we do not knowingly collect data relating to children.  
Communicating with us

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to assess and respond.

We record your request and our reply in order to increase the efficiency of our firm.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

### Complaint

If you are not happy with our privacy policy or if you have any complaint then you should contact us at [Privacy@Safa-Holmes.com](mailto:Privacy@Safa-Holmes.com) we record all the information you have given to us and use that information to resolve your complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

### Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us. Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### Compliance with the Law

Our privacy policy has been compiled so as to comply with the Law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the Law of your jurisdiction, we should like to hear from you. However, ultimately it is your choice as to whether you wish to use our website.

December 2020