



Strata Solicitors Limited

Privacy Notice

Strata Solicitors Limited

Strata House

Blisworth Hill Farm

NN7 3DB

www.stratasolicitors.com



This privacy notice describes how Strata Solicitors Limited ("Strata") ('we', 'us') may collect, handle and process personal information in relation to your access to or use of the services we provide.

This privacy notice applies to all of the services, websites and apps offered by Strata (collectively, the "**Services**"), but excludes Services which have separate privacy notices that do not incorporate this privacy notice.

1. PERSONAL INFORMATION WE USE

We may collect personal information about you from a variety of sources, including information we collect from you directly (e.g., when you contact us) and from other sources, described below.

Please note that we may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we may have with you. Failure to provide this information may prevent or delay the fulfillment of these obligations. We will inform you at the time your information is collected if the provision of certain personal information is compulsory and the consequences of the failure to provide such personal information.

1.1 Information we collect directly from you

Depending on the service, website or app that you are using, the categories of information that we may collect directly from you include:

- (a) personal details (e.g., name, date of birth);
- (b) company details (e.g., name, registered office);
- (c) contact details (e.g., phone number, email address, postal address or mobile number);

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- (d) government issued identification details (e.g., social security and national insurance numbers, passport details);
- (e) health and medical details (e.g., health certificates);
- (f) policy details (e.g., policy numbers and types);
- (g) bank details (e.g., payment details, account numbers and sort codes);
- (h) driving licence details;
- (i) online log-in information (e.g., username, password, answers to security questions);
- (j) information relating to the handling of any claims you are involved in;
- (k) other information we receive from you on applications or required questionnaires (e.g., occupation, current employer); and
- (l) information we collect automatically from you (e.g. click stream data, personal information and other data collected using cookies and other device identifying technologies ('Cookies')). Further information about our use of Cookies is available at Annex A below.

We do collect personal information about your online activities over time and across third party websites or online services. When we see a browser set to "do not track", signals transmitted from web browsers do not apply to our sites, and we do not alter any of our data collection and use practices upon receipt of such a signal.

1.2 Information we collect from other sources:

The categories of information that we may collect about you from other sources are:

- (a) personal details (e.g., name, date of birth);
- (b) company details (e.g., name, registered office);

- (c) contact details (e.g., phone number, email address, postal address or mobile number);
- (d) bank details (e.g., account numbers and sort codes);
- (e) financial information from consumer-reporting agencies for the purpose of ascertaining credit history; and
- (f) policy details (e.g., policy numbers and types).

We may receive such information via your employer, Insurance companies, consumer-reporting agencies, our affiliated companies, or other third parties in the course of conducting our business.

1.3 Sensitive personal information

We may also collect certain information about you which is considered more sensitive under local applicable laws, such as:

- (a) information about your race, ethnic origin, religious views and philosophical beliefs, membership of professional or trade associations, gender identity or sexual orientation for diversity and statutory monitoring purposes where appropriate; and
- (b) health, biometric or disability information required to administer policies or process claims.

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We may use your personal information to:

- (a) provide, maintain, protect and personalise our services;

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- (b) deal with your enquiries and requests;
- (c) perform system administration and to report aggregate statistical information to our professional regulators;
- (d) cooperate with our professional regulators and law enforcement bodies;
- (e) contact you with marketing and offers relating to products and services offered by us (unless you have opted out of marketing, or we are otherwise prevented by law from doing so);
- (f) personalise the marketing messages we send you to make them more relevant and interesting and to customize and enhance your website or app experience;
- (g) resolve complaints, as well as handle requests for data access or correction;
- (h) protect your, our or others' rights and interests; and
- (i) communicate with you regarding your account or changes to our policies, terms and conditions.

Some jurisdictions require a legal basis to use or process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfill our contractual obligations to you in connection with your engagement terms or contract with us, for example using your contact details to reply to your requests. Failure to provide this information may prevent or delay the fulfillment of these contractual obligations;
- (b) in order to comply with our legal obligations, for example to keep records of the services we provide you with as required by applicable law or regulation, or to comply with any governmental, quasi-governmental or court orders or subpoenas;

- (c) where there is a public interest in the processing, for example where it is necessary in order to prevent and detect fraud; and
- (d) to meet our or a third party's legitimate interests, for example to understand how you use our services and to enable us to derive knowledge from that to develop new services, to protect our rights or the rights of third parties, or to resolve any disputes. When we process personal information to meet our legitimate interests, we put in place robust safeguards to help ensure that your privacy is protected and that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

We may also obtain your consent to collect and use certain types of personal information, including when we are required to do so by law (for example, in certain jurisdictions where consent is always required to collect personal information, or in relation to our direct marketing activities or use of Cookies and Tracking Technologies, or when we process sensitive personal information about you). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You may have certain rights regarding your personal information, subject to local law. These include rights in certain circumstances to:

- access your personal information;
- request proof of the authorisation or previous consent given to us to perform the collection and processing of the personal information;
- rectify the information we hold about you;

- erase your personal information;
- restrict our use or disclosure of your personal information;
- object to our use or disclosure of your personal information;
- request information about the use and processing of your personal information by Strata;
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability);
- revoke the consent given by you for the processing of your personal information; or
- lodge a complaint with The Information Commissioners Office.

If you would like to discuss or exercise such rights, as applicable under local law, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honor your requests.

4. **INFORMATION SHARING**

We may share your personal information with third parties for the purposes described in this privacy notice under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform services and other business operations for us. For example, we may partner with other companies to help us provide our claims handling and other services.
- Our group companies. We work closely with other businesses and companies that fall under our parent Group, The Gallagher Group. We may share your personal information with other Gallagher Group companies for marketing purposes (subject to applicable laws or regulations), internal reporting and other purposes as described in this privacy notice.
- Law enforcement agencies, courts, professional regulators, government or quasi-governmental authority or other third parties. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, to enforce or apply any agreements between us and you, to resolve any disputes, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We will not sell your personal information to third parties other than to the extent reasonably necessary to proceed with the consideration, negotiation, or completion of a merger, reorganization, or acquisition of our business, or a sale, liquidation, or transfer of some or all of our assets. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we are a member of a global Group, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the Services). See the section on "International Data Transfer" below for more information.

When required by applicable law, when we share personal information with corporate third parties we will ensure that such third parties maintain a comparable level of protection of the personal information as set out in this privacy notice by using contractual or other means. To the fullest extent permitted by applicable law, we exclude all liability arising from the use of your personal information by third parties. When required by applicable law, data transfers will be logged and documented, identifying the recipient of the data, the purpose of the transmission, and the type

of data that was transmitted. Where required by law to do so, we can on request confirm the name of each third party that personal information is, or will be, transferred to.

5. INFORMATION SECURITY AND STORAGE

We implement technical, organisational, administrative and physical measures to help ensure a level of security appropriate to the risk to the personal information we collect, use, disclose and process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to help ensure the security of the processing. Please be aware that, despite our ongoing efforts, no security measures are perfect or impenetrable.

We restrict access to your personal information to those who require access to such information for legitimate, relevant business purposes.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- maintain business records for analysis and/or audit purposes;
- comply with record retention requirements under the law;
- defend or bring any existing or potential legal claims;
- deal with any complaints regarding the Services; and
- any other purposes for which personal information will be retained.

We will anonymise or delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place

appropriate measures to prevent any further processing or use of the personal information.

Please be aware that e-mail messages sent in clear text over the public internet can be observed by an unintended third party. Non-encrypted Internet e-mail communications may be accessed and viewed by other internet users without your knowledge and permission while in transit to us. If you wish to keep your information private, please do not use electronic mail to communicate information to us or request information from us that you consider to be confidential and/or proprietary. If you wish, you may contact us instead via telephone at the phone number provided on any communication you have received from us or on the phone number provided on our web site.

6. LINKS TO OTHER SITES

We may provide links to other websites not owned or controlled by us that we think might be useful or of interest to you. We are not, however, responsible for the privacy practices used by other website owners or the content or accuracy contained on those other websites. Links to other websites do not constitute or imply endorsement by us of those web sites, any products or services described on those websites or any other material contained in them. We advise that you contact any third-party websites directly for their individual privacy policies.

7. INTERNATIONAL DATA TRANSFER

We may transfer certain personal information across geographical borders to our subsidiaries or service providers (working in conjunction with us or on our behalf) worldwide. Such transfers are made in accordance with applicable law.

Where you are based in the European Union you should be aware that your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law.

Where you are based outside of the European Union, you should be aware that your personal information may be transferred to, stored, and processed in a jurisdiction that is not your home jurisdiction. You consent to the transfer, disclosure, storage and/or processing of your personal information outside the jurisdiction in which the information was originally collected.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal information is adequately protected.

For more information on the appropriate safeguards in place, please contact us at the details below.

8 CONTACT US

Our Data Protection Officer can be contacted at:

Strata Solicitors Limited

Strata House

Blisworth Hill Farm

Stoke Road

Blisworth

Northamptonshire

NN7 3DB

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to make a complaint to The Information Commissioners Office.

9 **CHANGES TO THE PRIVACY NOTICE**

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time, under applicable local laws.

Where changes to this privacy notice will have a fundamental impact on the nature of our processing of your personal information or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise any rights you may have under applicable law (e.g. to object to the processing).

We reserve the right to make changes to our Privacy Policy at any time consistent with applicable local laws. Such changes, as long as they do not have a fundamental impact on the nature of our processing of your personal information or otherwise have a substantial impact on you, will be posted on this page. We encourage you to review the website and the Privacy Policy in particular periodically for any updates or changes

Annex A - Cookies Policy

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us to:

- estimate our audience size and usage pattern;
- store information about your preferences, and so allow us to customise our site according to your individual interests;
- speed up your searches; and
- recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which may allow you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site unless otherwise prohibited by applicable law.

We do not use cookies to track or report on activity when you are not on our website or to provide such information to other parties for their own marketing use. We do not use cookies to collect personal information such as your e-mail address, and we do not combine information collected through cookies with your personal information. We make no attempt to look at or examine other cookies or information that may be stored on your computer.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org, or www.aboutcookies.org.

27 JULY 2018