

Georgina Robbins Associates Limited Privacy Notice

Introduction

Georgina Robbins Associates Limited (“we”), (“us”) or (the “Company”) provides regulatory compliance consultancy services to financial services companies and related businesses. We take the protection of your privacy very seriously. This Privacy Notice explains when and why we collect personal information, how we use it, how we keep it secure and your rights in relation to it.

Processing Personal Data

Where personal data is provided to the Company such as a name, position or title and contact details, this information will be controlled and processed by the Company in compliance with the Data Protection Act 2018 (the “DPA”) and the General Data Protection Regulation (“GDPR”), as implemented in the UK and as may be updated from time to time, the (“Data Protection Laws”).

What Personal Data information we may collect

The personal information that we collect and hold typically consists of contact details obtained or provided to us for the purposes of the Company carrying on its compliance consultancy services and professional networking:

- Name and job title
- Company / employer
- Workplace address
- E-mail address
- Phone number

We do not collect personal data about children or any “special categories” of personal data under the GDPR.

How we use the information

Our lawful bases for collecting and processing personal data are:

- Performance of contracts with our clients
- Our legitimate interests
 - To provide information about our services
 - To perform our compliance consultancy services
 - To communicate with clients about an assignment
 - To communicate and discuss regulatory developments
 - For the purposes of networking and business development

- To comply with our legal and regulatory obligations including record-retention and reporting

The Company is the data controller of personal data that it collects and processes.

Where a client may provide the Company with certain personal data to process on behalf of the client, the client is the data controller and the Company is the data processor.

The Company does not conduct profiling or marketing campaigns by email or other written or electronic media.

Disclosure of your information

We may disclose or transfer personal data to third parties:

- Where necessary to carry out our obligations arising from any contracts or service agreements between you and the Company;
- Where we believe it is necessary or consistent with our legitimate interests in operating our business, including to third-party service providers such as our professional advisors (lawyers, accountants and consultants), IT, telecoms suppliers and insurers;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or
- To protect our rights, property or safety of that of our clients or any third party we interact with.

The Company complies with its obligations under the DPA and GDPR by

- Keeping personal data up to date
- Storing and destroying it securely
- Not collecting excessive or unnecessary amounts of data
- Protecting personal data from loss, misuse, unauthorised access and disclosure
- Retaining personal data only for so long as it is needed to perform a contract, to service an on-going client relationship, or to satisfy a legal or regulatory obligation
- Ensuring appropriate measures are in place to protect personal data

All personal information is stored securely on the Company's business premises and in on-line systems which are password protected, subject to firewalls, anti-virus and anti-ransom ware, and backed up on a cloud-based system.

All third-party service providers are subject to a duty of confidentiality and are obliged to have appropriate technical and organisational measures to protect personal information, in line with Data Protection Laws.

We undertake to use a commercially reasonable selection process by which we evaluate the security, privacy and confidentiality practices of proposed sub-processors that will or may have access to or process Client Personal Data.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted email; and, any transmission is at your own risk. Once We have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Storing your personal data

How long we keep your personal data:

- Your personal information is kept private and stored securely until it is no longer required for the purpose for which it was collected or has no use
- Unless otherwise agreed with you, we may hold personal data for 6 years following termination or expiry of the relevant services, or for as long as is necessary to satisfy applicable legal, accounting or reporting requirements.

Where we store your personal data:

- The Company processes and stores your personal data in the United Kingdom
- We may process and store your personal data using third party service providers. (e.g. Microsoft Office 365, Dropbox) and their processing of your personal data may involve a transfer of data outside the UK/EEA. Third party service providers which process or store personal information for or on behalf of the Company are required to respect the security of personal information and to treat it in accordance with the relevant Data Protection Laws

Your rights. You can

- Access and obtain a copy of your personal data on request (this includes why we hold the information, who has access to it and where we obtained the information from)
- Ask us to update data, or to change incorrect or incomplete data about you
- Ask us to delete or stop processing your data. We will confirm whether the data has been deleted or processing stopped. We will provide a reason if the data cannot be deleted or if we continue to process it (for example because we need it for regulatory purposes or legitimate interests)



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ASSOCIATES LIMITED

- Request that we transfer some of your data to another controller. We will comply with the request, where it is feasible to do so, within a month

You have the right to lodge a complaint with the Information Commissioner's Office. Information on how to complain is available at www.ico.org.uk.

Website and Cookies

The Company website does not use internet cookies. Where you submit personal information using the contact form on the website you consent to GRA storing and processing such information in accordance with this Privacy Notice. Users contacting us through the Company website do so at their own risk.

Any downloadable documents, files or media made available on the Company website are provided to users at their own risk. While all precautions have been undertaken to ensure that only genuine downloads are available users are advised to verify their authenticity using third-party anti-virus software or similar applications.

Changes to our Privacy Notice

We reserve the right to modify this Privacy Notice and update it at any time. Please check the Company website for the current Privacy Notice. Your continued use of the services and the website shall be deemed your acceptance of the varied Privacy Notice.

Consent

By providing your personal information to us, you signify your consent to our using the information in the manner described above. If at any time you wish to update your personal information please contact Georgina Robbins by email at georgina@georginarobbinsassociates.com.

Georgina Robbins Associates Limited
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