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## PRIVACY NOTICE

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### BACKGROUND:

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

#### 1. Information About Us

**ASCHERI & PARTNERS LTD** is a Private Limited Company registered in England under company number **07158090** with Registered Address in Birchin Court Suite 603, 20 Birchin Lane, City of London, London EC3V 9DU, United Kingdom.

Representative: Mr Guido Ascheri

Email address: [info@ascheri.co.uk](mailto:info@ascheri.co.uk)

Postal address: Birchin Court Suite 603, 20 Birchin Lane, EC3V 9DU, United Kingdom.

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the *General Data Protection Regulation* (EU Regulation 2016/679) (the "GDPR") and the *Data Protection Act 2018* (collectively, "the Data Protection Legislation") 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.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, 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 Notice 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 11.
- b) The right to access the personal data we hold about you. Part 10 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 11 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 hold. Please contact us using the details in Part 11 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 withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time. You may unsubscribe at any time by clicking "unsubscribe" in any email you receive or by e-mailing us at [info@ascheri.co.uk](mailto:info@ascheri.co.uk).
- h) 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.
- i) 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 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

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. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data and personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected
Identity information including name, surname, title, date of birth, gender, copies of identity documents (ID Cards, passports), NIN numbers.
Contact information including email address, telephone number, address, office address.
Business information including business name, job title, profession.
Payment information including bank account details.

## How We Collect your Data

Direct Interactions with us or our staff by phone, email, post or during exhibitions and events. This includes personal data you provide when you buy our products or services, or when you place an order for goods or services, subscribe to our services, request marketing to be sent to you, give us some feedback.

Third parties and publicly available sources: we may receive personal data about you from various third parties and public sources. To learn more, please write us using the contact details provided in Part 11.

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
To initially engage with you when you interact with us.	Identity, Contact and Business information.	Contractual, consent.
Internal record keeping.	Identity, Contact and Business information.	Contractual.
Supplying our services to you; Processing your requests.	Identity, Contact and Business information.	Contractual.
Managing payments for our services; Send invoices and other accounting documents.	Identity and Payment information.	Contractual.
Communicating with you via phone, fax, SMS, emails, ecc. and generally, manage our relationships with you; Notifying you about changes to our terms of use or privacy policy.	Identity, Contact and Business information.	Contractual, consent, legitimate interest (to comply with our legal obligations).
Supplying you with information by email or post that you have opted-in-to (you may opt-out at any time by clicking "unsubscribe" in any email you receive or by e-mailing us at): info@ascheri.co.uk	Identity, Contact and Business information.	Consent.
Transmit orders, quotations and commercial proposals.	Identity, Contact and Business information.	Contractual, consent, legitimate interest (for

		running our business).
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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 and telephone or text message or post with information, news, and offers on our products and services. 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 Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purposes for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purposes and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purposes for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

#### **7. How Long Will You Keep My Personal Data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. For more detailed information, please see our Data Retention Policy or contact us at: [info@ascheri.co.uk](mailto:info@ascheri.co.uk).

#### **8. How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

If we need to transfer your personal information outside the EEA to a country which does not provide the same level of data protection as the country in which you normally use our products or services, we will take appropriate steps to ensure that your personal information is adequately protected.

#### **9. Do You Share My Personal Data?**

We may sometimes share your personal data with other companies or third parties not included in the list which collaborate with us in order to supply services and for the purpose of formulating offers, quotations and proposals for collaborating with us.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

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.

**10. 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". You can use the Subject Access Request Form available on request.

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights regarding your personal data, you must contact us in writing by sending an email or letter to the addresses shown in Part 11.

We will respond to your request as soon as possible and, in any case, not more than one month after receiving it. Normally, we aim to provide a complete response, including a copy of your personal data if requested within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of two months from the date we receive your request. You will be kept fully informed of our progress.

**11. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of **Mr Guido Ascheri**):

Email address: [info@ascheri.co.uk](mailto:info@ascheri.co.uk)

Postal Address: Birchin Court Suite 603, 20 Birchin Lane, City of London, London EC3V 9DU, United Kingdom.

**12. Changes to this Privacy Notice**

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 made available on our website.