



PRIVACY POLICY

DATE

April 2020

REVISION

2.0

Table of contents

1.	Introduction and purpose	2
1.1.	Who we are	2
1.2.	Purposes of this policy	2
1.3.	Why we might collect your personal information	2
1.4.	Change of purpose	3
2.	Data protection principles	3
2.1.	General principles	3
2.2.	What is the basis for processing your personal data?	3
2.3.	If you fail to provide personal information	4
3.	The kind of information that we hold about clients and suppliers	4
3.1.	How we collect Clients' and Suppliers personal information	5
3.2.	How we use clients' and suppliers' personal information	5
4.	The kind of information that we hold about subscribers	6
4.1.	How we collect subscribers' personal information	7
4.2.	How we use subscribers' personal information	7
5.	Data sharing, security and retention	7
5.1.	Data sharing	7
5.2.	Data security	8
5.3.	Data retention	8
5.4.	Changes to your data	8
6.	Visitors to our website	8
6.1.	General	8
6.2.	Cookies	9
6.3.	Google Analytics	9
7.	Your rights	10
8.	Changes to this policy	11
9.	Complaints	11
	Data Protection Contact	12

1. Introduction and purpose

1.1. Who we are

Your personal information will be held by Leapmoor LLP. Leapmoor LLP ('we', 'our', 'us', 'the Company') is committed to protecting the privacy and security of personal information.

Leapmoor LLP is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information. We are required under data protection laws to notify you of the information contained in this policy.

1.2. Purposes of this policy

This policy describes how we collect and use personal information about you.

For the purposes of this policy:

- 'Clients' includes natural persons who have instructed us on behalf of a company, partnership, trust, estate, agency, department, corporate body of any description or any other group or organisation;
- 'Suppliers' includes any natural person whom we have instructed to provide goods or services or contractors providing information in connection with a contract tender or prequalification procedure that we are managing or assessing on behalf of a third party; and
- 'Subscribers' includes natural persons that have signed up to our newsletters or have attended or registered to attend one of our events or follow us on social media.

This policy applies to the personal information of past and present clients, suppliers and subscribers. Please note that you may fall in to more than one of these categories so we may hold your personal information in a number of capacities.

If you are a past or present employee, member or consultant of the firm, we will hold further personal information about you. For further details please speak to your line manager.

This policy does not form part of any contract that you may have with the Company. It is provided for information purposes only.

For information about the cookies that we use on our website and in our communications, please see our Cookie Policy.

We retain the right to update this policy at any time and we will provide you with a new policy when we make substantial updates.

1.3. Why we might collect your personal information

In general terms, we collect and use personal information to:

- deliver our services and meet our legal responsibilities
- verify your identity where this is required
- contact you by post, email or telephone
- understand your needs and how they may be met

- maintain our records
- process financial transactions
- prevent and detect crime, fraud or corruption

1.4. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose and that purpose is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

2. Data protection principles

2.1. General principles

We will comply with data protection law. The law says that the personal information that we hold must be:

- Used in a lawful, fair and transparent way.
- Collected only for valid purposes that we have clearly explained and not used in any way that is incompatible with those purposes.
- Relevant to the purposes for which it was collected and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes for which it was collected.
- Kept securely.

2.2. What is the basis for processing your personal data?

Our processing of Personal Data is aimed purely to allow us to respond to your requests (such as for us to contact you, or to send you information). We will only use personal information lawfully. The law says that we must identify a lawful basis for each use of personal data. We rely on a number of lawful bases, including:

Legal Basis	Example
Performance of a contract	Where we enter into a contract for the provision of products or services, we may need to collect and process your personal data so that we can meet our contractual obligations. This also applies to any pre- contract activity, such as providing a quote or details regarding the products or services that you have expressed an interest in
Regulatory and legal obligations	We may collect and process Personal Data to comply with our regulatory or legal obligations. For example, where we are legally obliged to keep records of sales and any associated tax records.
Legitimate commercial interests	We may process Personal Data where such processing is necessary to pursue our legitimate commercial interests, such as operating our business and defending legal claims.

Legal Basis	Example
Consent	Where we rely specifically on consent to collect and process non-mandatory Personal Data, you are not obliged to provide your consent for the use of your Personal Data and you may subsequently withdraw your consent once it has been provided. It should be noted however that this may limit your experience with our resources and services.

2.3. If you fail to provide personal information

If you fail to provide certain personal information when we request it, we may not be able to perform our contract with you properly or we may be prevented from achieving our legitimate interests (such as engaging with you on social media).

3. The kind of information that we hold about clients and suppliers

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (such as anonymous data).

There are some 'special categories' of more sensitive personal data which require a higher level of protection.

We may collect, store and use some or all of the following categories of personal information about Clients and suppliers

(A) Client or supplier engagement information: name, title, job title, address, telephone number, email address, credit check.

(B) Client or supplier file information: name, title, job title, address, telephone number, email address, bank account details.

(C) Matter file information: The categories of personal information that we hold about you for the purposes of specific matters that we are doing business with you. Where we have collected this information other than from you, we will always ask you to confirm its accuracy. An example of this might be information about employment, directorships or shareholder details.

(D) Marketing information: name, title, job title, address, telephone number, email address, company, engagement details (click-throughs, open rates, bounce rates, return to sender notifications) event attendance history, payment details and marketing preferences.

(E) Social media information: username, company details and engagement details (likes, retweets, shares, reactions, comments).

We may also collect, store and use the following 'special categories' of more sensitive personal information about clients and suppliers:

(F) Criminal records: criminal convictions and offences.

(G) Accessibility information.

3.1. How we collect Clients' and Suppliers personal information

We collect personal information in categories A and B directly from clients and suppliers as part of our file opening process.

We collect personal information in categories C, F and G directly from clients or suppliers as we take instructions or through procurement of suppliers in relation to specific matters. We may also obtain further information about specific matters from other sources including publicly available registers, court transcripts, and credit searches.

We collect personal information in categories D directly from clients and suppliers over the course of our relationship. We may also collect further information from other sources such as Companies House or market information providers.

We collect personal information in category E either from Individual clients and Business clients directly or from social media platforms when clients or suppliers engage with our social media accounts on Facebook, Google, Twitter, Instagram and LinkedIn.

3.2. How we use clients' and suppliers' personal information

We have set out the purposes for which we use each category of personal data and the lawful bases which are relevant to those purposes.

We use your client and supplier engagement information to conduct certain compliance checks that we are required to carry out by law. Our lawful basis for this is that we have a legal obligation to conduct these checks.

We use your client and supplier file information for communicating with you in the course of conducting business with you, this includes taking your instructions, instructing you to supply goods or services to us or our clients and invoicing our fees and disbursements. Our lawful basis for this is that it is necessary in order to pursue the legitimate interest of the entity you represent in seeking our services or supplying to us.

We use your matter file information to provide our consulting services to you or to instruct you to provide goods or services to us or our clients. Our lawful basis for this is that it is necessary in order to pursue the legitimate interest of the entity you represent in seeking our services or supplying to us.

We use your marketing information for marketing purposes, this includes contacting you with relevant newsletters and other information about our services, inviting you to events and measuring engagement with our communications to ensure that the content that we create is relevant and useful. Our lawful basis for this is your consent. You have the right to withdraw this consent or amend your marketing preferences at any time by contacting us.

We hold your social media information in the course of operating our social media accounts on Twitter, Facebook, LinkedIn, Instagram and Google. Our lawful basis for this is that it is necessary in order to pursue our legitimate interest in maintaining a visible, engaging and relevant social media presence.

'Special categories' of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information:

We use accessibility information (sensitive) to ensure that our offices and events are inclusive and accessible to all. Our lawful basis for this is our legitimate interest in ensuring that our offices and events that we organise are accessible to all.

We may be provided with criminal records information (sensitive) as part of a tender return. Our lawful basis for this is that it is necessary in order to pursue the legitimate interest of the entity you represent in seeking to supply goods or services to us.

4. The kind of information that we hold about subscribers

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (such as anonymous data).

There are some 'special categories' of more sensitive personal data which require a higher level of protection.

We collect, store and use some or all of the following categories of personal information about clients and suppliers;

(H) Relationship information: name, title, job title, address, telephone number, email address, client or supplier relationship details (length of relationship, Firm contacts engaged with)

(I) Marketing information: name, title, job title, address, telephone number, email address, company, engagement details (click-through rates, open rates, bounce rates, return to sender notifications) event attendance history, payment details, reviews, case studies, testimonials and marketing preferences.

(J) Social media information: username, company details and engagement details (likes, retweets, shares, reactions, comments).

We may also collect, store and use the following 'special categories' of more sensitive personal information about subscribers:

(K) Accessibility information (sensitive)

4.1. How we collect subscribers' personal information

We collect personal information in categories , H, I, and K directly from you over the course of our relationship, this may be when you sign up to a newsletter, when we work together on a project, when you attend one of our events, or some other time when you engage with us directly. We may also source some of this information from other sources such as Companies House or market information providers.

We collect personal information in category J either from you directly or from social media platforms when you engage with our social media accounts on Facebook, Instagram, Google, Twitter and LinkedIn.

4.2. How we use subscribers' personal information

We have set out the purposes for which we use each category of personal data and the lawful bases which are relevant to those purposes.

We use your relationship information to manage and strengthen our relationship with you, this includes linking the work that we do across different service areas to ensure that you receive a seamless, streamlined service at all times. Our lawful basis for this is necessary in order to pursue our legitimate interests in creating and maintaining deep and lasting relationships with our contacts.

We use your marketing information for marketing purposes, this includes contacting you with relevant newsletters and other information about our services, inviting you to events and measuring engagement with our communications to ensure that the content that we create is relevant and useful. Our lawful basis for this is your consent. You have the right to withdraw this consent or amend your marketing preferences at any time by contacting us.

We hold your social media information in the course of operating our social media accounts on Twitter, Facebook, LinkedIn, Instagram and Google. Our lawful basis for this is that it is necessary in order to pursue our legitimate interest in maintaining a visible, engaging and relevant social media presence.

'Special categories' of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information:

We use accessibility information (sensitive) to ensure that our offices and events are inclusive and accessible to all. Our lawful basis for this is our legitimate interest in ensuring that everyone can access and make use of our offices and events.

5. Data sharing, security and retention

5.1. Data sharing

We do not pass on or sell online personal information to third parties. We may however share information within our organisation. This may include our employees, agents, contractors and sub-contractors. Please note that by sending your personal information to us you are consenting to the processing and transfer of such information in this way.

5.2. Data security

We have put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those people who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

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

5.3. Data retention

We only keep Personal Data for as long as necessary for the purpose or purposes it was collected for. Records are retained for a predefined retention period that may extend beyond a contract with Leapmoor LLP. Personal Data is retained to comply with other legal and contractual obligations and requirements such as Health and Safety. Where required, further information concerning our records retention policy can be obtained from us.

We retain social media information for the period during which we are connected on any given social media platform only.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Where you have chosen to unsubscribe from marketing communications, we will retain your contact details to ensure that you are not sent any further communications. This information will be held indefinitely.

5.4. Changes to your data

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes during your working relationship with us. If your personal information changes, please let us know by emailing our Data Protection Officer (DPO).

6. Visitors to our website

6.1. General

We receive, collect and store any information you enter on our website. In addition, we collect the Internet protocol (IP) address used to connect your device to the Internet and computer and connection information. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page.

6.2. Cookies

6.2.1. What are cookies

Cookies are small, often encrypted, text files, which are stored on your device when you visit some websites. They remember useful information which allows aspects of the website to work. These cookies do not collect or store any personally identifiable information. You can find out more about cookies from www.allaboutcookies.org.

Cookies last for different lengths of time depending on what they are used for. Session cookies, for example, are temporary and are only stored until you leave the website or when you close your web browser. Persistent cookies last for a fixed period of time, defined within the cookie, and allow the website to recognise the device again when the user returns to that website on that device.

6.2.2. Who sets the cookies

First party cookies are set by the website that you are visiting (in this case, us) and can only be read by that website. Third party cookies are set by an organisation other than owner of the website. These might be for measuring traffic or for allowing a visitor to watch a video from that third party.

6.2.3. How to disable cookies

You can accept or decline cookies. A lot of web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. You can manage how you use cookies using the settings in your web browser. The following links explain how to access cookie settings in various browsers:

- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Google Chrome](#)
- [Cookie settings in Safari \(OS X\)](#)
- [Cookie settings in Safari \(iOS\)](#)
- [Cookie settings in Android](#)

Please note: these links will take you to other sites. We are not responsible for the information and also the setting of cookies on these websites.

6.3. Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

7. Your rights

Under certain circumstances, by law you have the right to:

Request access to your personal information. This is commonly known as a subject access request. This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

Request the reconsideration of an automated decision. This enables you to ask us to reconsider a decision that was made solely by automated means or to ask for human intervention.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, request that we transfer a copy of your personal information to another party or request the reconsideration of an automated decision, please contact our DPO.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We may, in some instances, be unable to provide all the personal information we hold about you, if in doing so, it would disclose personal information about another individual. We will let you know if this is the case and decide whether you need to

Where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to.

8. Changes to this policy

We keep our privacy policy under regular review. This privacy notice was last updated on 16/04/20.

9. Complaints

If you have any concerns over how we use your data, please contact our DPO in the first instance. If you are not satisfied that we have addressed your concerns adequately, you have the right to lodge a complaint with the Information Commissioner's Office. Their contact details are below:

The Information Commissioner's Office – Scotland

45 Melville Street

Edinburgh

EH3 7HL

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk



Data Protection Contact

We have appointed a Data Protection Officer (DPO) to oversee compliance with this policy. If you have any questions about this policy or how we handle personal information, please contact the DPO in writing using the details below.

Leapmoor LLP

Gourock Municipal Buildings- Suite 3

122 Shore Street

Gourock, PA19 1QZ

Email: alison@leapmoor.co.uk