

What we use your personal data for - and Why

Under data protection law, we can only use your personal data if we have a proper reason, for example:

- you have given consent—where we need your consent, we will ask for it separately of this privacy policy and you can withdraw consent at any time;
- to comply with our legal and regulatory obligations;
- to fulfil our contract with you or take steps at your request before entering a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. The table below explains what we use your personal data for and why.

<i>What we use your personal data for</i>	<i>Our reasons</i>
Providing services to you	To fulfil our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our clients and verify their identity Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under rules issued by our professional regulator	Depending on the circumstances: – to comply with our legal and regulatory obligations – for our legitimate interests
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: – for our legitimate interests, i.e. to protect our business, interests and rights – to comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring internal business policies are complied with, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures

What we use your personal data for	Our reasons
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, i.e. to improve the efficiency, management and profitability of our business
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: <ul style="list-style-type: none"> – to comply with our legal and regulatory obligations – for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, services range or other efficiency measures	For our legitimate interests, i.e. to improve the efficiency, management and profitability of our business
Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems	Depending on the circumstances: <ul style="list-style-type: none"> – to comply with our legal and regulatory obligations – for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us
Updating client records	Depending on the circumstances: <ul style="list-style-type: none"> – to fulfil our contract with you or to take steps at your request before entering into a contract – to comply with our legal and regulatory obligations – for our legitimate interests, e.g. marketing - making sure we can keep in touch with our clients about existing and new services, and changes to the law
Statutory returns	To comply with our (or your) legal and regulatory obligations
Staff administration and assessments	Depending on the circumstances: <ul style="list-style-type: none"> – to comply with our legal and regulatory obligations – for our legitimate interests, e.g. to make sure we are following our own internal procedures and working efficiently
Marketing our services (and those of selected third parties) to existing and former clients and third parties	Depending on the circumstances: <ul style="list-style-type: none"> – for our legitimate interests, i.e. to promote our business – consent
Identity checks via external reference agencies	To comply with our legal and regulatory obligations i.e. to verify the identity of prospective or returning clients
External audits and quality checks, e.g. for quality, information security and other accreditations and the audit of our accounts (to the extent not covered by 'activities necessary to comply with legal and regulatory obligations' above)	Depending on the circumstances: <ul style="list-style-type: none"> – for our legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards – to comply with our legal and regulatory obligations

What we use your personal data for	Our reasons
<p>To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> – to comply with our legal and regulatory obligations – in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws. For example:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent;
- the processing is necessary to establish, exercise or defend legal claims; or
- the processing is necessary for reasons of substantial public interest.