

DATA PROTECTION POLICY

Quantum Immigration is a trading name of Addison & Khan Solicitors. Please note that all references hereafter will be as Quantum Immigration. Quantum Immigration is a regulated branch office by the Solicitors Regulatory Authority, 647648.

Quantum Immigration understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and clients and will only collect and use 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

Quantum Immigration is regulated by The Solicitors Regulation Authority with SRA Number: 647648.

Our registered address is 99 Bishopsgate, London. EC2M 3XD.

For the purpose of the General Data Protection Regulations, we are the Data Controller.

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") 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 6, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, in certain circumstances which we will always work to uphold:

- a. The right to be informed about 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 12.

- 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 12 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 have. Please contact us using the details in Part 12 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 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.
- h. Rights relating to automated decision-making and profiling. We do not use your personal data in this way. Part 6 and 7 explains more about how we use your personal data.
- i. the right to ask us to provide you, or a third party, with copies of the Personal Information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- j. the right to request erasure, anonymization or blocking of your Personal Information that is processed in breach of the law;
- k. the right to object on legitimate grounds to the processing of your Personal Information. In certain circumstances we may not be able to stop using your Personal Information, if that is the case, we'll let you know why; and
- l. withdrawal of consent – while we do not generally process Personal Information on the basis of consent when Personal Information is processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Information where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership). In the event that you no longer want to receive any marketing material from us, please use the unsubscribe option (which is in all of our marketing emails to you) or contact the relevant Data Protection Officer as set out below.

To exercise such rights (bar withdrawing from marketing emails – as described above) and if you

have any questions about how we collect, store and use Personal Information, then please contact us.

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 12.

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.

5. Why is Personal Data Collected?

We will only process Personal Information where we have a lawful reason for doing so. The lawful basis for processing Personal Information by us will be one of the following:

- a. the processing is necessary for the performance of a contract you are party to or in order to take steps at your request prior to you entering into a contract;
- b. the processing is necessary in order for us to comply with our legal obligations (such as compliance with anti-money laundering legislation);
- c. the processing is necessary for the pursuit of our legitimate business interests (including that of the delivery and the promotion of our services); and
- d. processing is necessary for the establishment, exercise or defence of legal claims.

6. What Personal Data Do You Collect?

We aim to be transparent about why and how we process Personal Information. For further information on our processing activities please review the relevant section below:

a. Business Contacts Collection

We process Personal Information about contacts which is uploaded to our secure UK based database. Personal Information is collected and added to this secure database by Quantum Immigration's Member of staff, and includes: name, email address, job title, telephone number, area of business, job role, jurisdiction, language, seniority and other business contact information. The Personal Information may be collected so that we may provide our services to you. In addition, Personal Information may also be collected via our websites, www.gillp.com / www.addisonkhansolicitors.co.uk.

Use

For contact and communication purposes: such as legal updates events we are organising or participating in, and/or other information about us and the services that we provide that we believe may be of interest to you. You may wish to opt-out of this option by contacting us or a Member of staff.

Retention

Personal Information is retained on our secure database for as long as it is necessary for the purposes set out above (being the length of the business relationship). If a business contact requests to be forgotten their contact details will be deleted from our database. If a business contact opts out of receiving marketing materials their details will still be retained (as our lawyers may still be in contact) but marketing materials will no longer be sent.

b. Quantum Immigration and Third Parties (associated individuals):

We request our clients only provide Personal Information which is necessary for us to carry out our services. Such information is uploaded to a secure database within the UK.

If we need Personal Information in respect of individuals associated with clients in order to provide legal services we ask our clients to provide this Policy to the data subjects.

In the most circumstances, we collect Personal Information from our clients or from third parties acting on behalf of our clients.

We will use and disclose Personal Information in such a manner only in the course of providing legal services and where reasonably necessary to provide such services, for example instruct counsel on your behalf).

We may collect Personal Information to collect fees or costs in connection with other legal enforcement, we will use Personal Information to agree payment arrangements, and to collect our fees and costs owing to us in connection with legal enforcement.

We may also be providing clients with information on our services and legal updates that we consider may be relevant to them; arranging and hosting events; and identifying where we may make improvements in service delivery.

In the course of our carrying out our business activities we may be required to undertake certain background searches to verify whether or not there are any potential issues that may mean we cannot work with a particular person (to identify criminal convictions, politically exposed persons, sanctions).

As a Law Firm we are a regulated by the Solicitors Regulation Authority whereby we need to carry out checks and collect Personal Information for the purpose of compliance with anti-money laundering regulations: (e.g. evidence of your identity) this information will be shared with any relevant party as required by law.

Our general retention period for documentation created for the purpose of providing legal services is 6 years. Legal and Regulatory exceptions may apply and require documentation to be held for longer or shorter periods. You may contact us for more information on this.

c. Employment

We may require information for recruitment and as per Human Resources Department. All employees are provided with our Data Protection Policy prior to commencement of Employment.

We hold Personal Information of our Employees to fulfil our obligations under Employment Law. These may include Criminal Record Checks where necessary, Right to Work documentation, Proof of Address and all other reasonably necessary information.

We may need to hold details of our Employees as per the Solicitors Regulation Authority requirement as well as per requirement by Law such as HMRC requirements.

For any queries please contact our Human Resources Department.

d. Suppliers / Contractors

Personal Information and relevant contact information, is collected to receive services from suppliers to facilitate provision of services to our clients.

We will disclose Personal Information which we believe is reasonably necessary to for provision of those services from suppliers.

If a supplier is assisting us in delivering services to our clients we will process Personal Information to manage that relationship.

A general retention period of 6 years or less will be applied unless there are any legal and or regulatory exceptions which may require documentation to be held for shorter or longer periods. Please contact us for more information if required.

e. Privacy and Data Protection

Personal Information for staff is held internally incorporating the firms Internal Privacy and Data Protection Policy. Staff is provided with this information.

f. CCTV Security System

We use CCTV on our premises to ensure the health & safety of our Employees as well as our clients. As a law firm we are need such security measures are in place

g. Website

Personal Information may be collected if you visit us at www.gillp.com / www.addisonkhansolicitors.co.uk and sign up for our marketing events, request marketing literature or want any updates on our services.

7. How Do You Use My Personal Data?

Under the GDPR we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to

our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Providing and managing your legal matters
- Providing our legal services to you. Your personal details are required in order for us to enter into a contract with you as your legal representatives/lawyers.
- Personalizing and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or that you have opted-in to (you may unsubscribe or opt-out at any time by requesting us via email or contacting a member of staff).

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, telephone, text message post with information, news, and offers on our 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 GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

8. International Transfers & Outsourcing Agreements

We may at time need to transfer your Personal Information to our outsourced agents that are located in territories outside of the European Economic Area (“EEA”), in order to provide you with the services required.

Territories outside of the EEA do not always offer the same standard of data protection as within the EEA. We will ensure that your Personal Information is only ever treated in accordance with our Data Protection Policy.

Where necessary, we have entered into standard European Commission approved form model data protection clauses with outsourced agents that are located in territories outside of the EEA to provide you with the service required and with our external service providers and business partners in relation to services that they may provide that involve processing data from locations outside of the EEA for which we are Data Controller.

9. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- 6 years for retention of personal information and documentation created for the purpose of providing legal services
- We may have a shorter period of time, where reasonable for other data relating to suppliers, staff, administration etc

10. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

11. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, except for where legally required to share certain personal data, which might include legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

12. 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”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request 14 working days (for more urgent matters we may be able to provide access within 7 working day) and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

13. 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:

- Data Protection Officer: Miss Fakhria Iqbal
- fakhria@addisonkhansolicitors.co.uk
- Human Resources/ Employment Queries: Miss Tahsin Wahab
- tahsin@addisonkhansolicitors.co.uk
- Telephone number: +44 20 8514 4836.

14. 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 – www.qillp.com / www.addisonkhansolicitors.co.uk