

PRIVACY NOTICE

Welcome to the Braham Good (“BG”) Privacy Notice. Braham Good is the trading name of Braham Good LLP (“we”, “us”, “our”), a company registered in England and Wales under Company Registration Number OC306578 with its registered office at 76 New Cavendish Street, London, United Kingdom, W1G 9TB. We are registered as a Data Controller with the Information Commissioners Office under number ZB308782.

This Privacy Notice (“**Notice**”) explains how we use (“**Process**”) your personal information (including personal information that you provide to us about other persons) (together, “**Personal Information**”). It also explains your privacy rights and how you can exercise them.

We respect your privacy and we are committed to protecting your personal data. We are responsible for the Personal Information we collect about you (including through the website www.brahamgood.co.uk). The type of Personal Information we collect and how we Process it will vary depending on the relationship we have with you. Please note in particular that:

- We may use cookies on our website and in any marketing emails to help us manage and improve our websites, your browsing experience, and the material/information that we send; and
- As a collaborative business, we may share certain Personal Information with our related entities or other persons engaged to provide the agreed services to you and also select third parties, subject to appropriate safeguards.

We will publish updates to this Privacy Notice on this website, with relevant changes highlighted as appropriate. Where we hold or Process your Personal Data, we will also take appropriate measures to inform you of any amendments which have a material impact on you and your ability to exercise your privacy rights.

If you have any questions regarding our processing of your Personal Information or would like to exercise your privacy rights, please email: a.rosen1@btinternet.com

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect Personal Information to provide our services, for legal and regulatory purposes and to manage our business and relationships. For further details, please see the ‘Use of your Personal Information’ section of this Notice below.

How we collect information

Public information	Personal Information about you or your business which is publicly available, for example on your employers’ website, public professional social networking sites, the press; and relevant electronic data sources
Information from third parties	Personal Information provided to us by third parties (for example by our clients; joint agents; sub-agents; suppliers; advisers; consultants, lawyers and other professional experts; counterparties; previous, current and future employers; correspondents and enquirers; regulators and public authorities; relatives; and other persons) where such Information is provided to us in connection with the relevant purposes set out in this Notice.
Information collected through our websites	We may use cookies on our website and certain marketing emails which collect your IP address and certain other information from you when you visit our website. For further details please see the ‘Marketing and Cookies’ section.

You will voluntarily provide most of your Personal Information directly to us. We will also obtain Personal Information from other sources or persons. Sometimes the provision of your Personal Information to us by third parties will be unsolicited and/or provided in confidence (for example, reports made to us by regulators and other persons) and we will be unable to notify you of this. In all cases we shall take such necessary steps to ensure that Personal Information is obtained and used in a fair and lawful way.

THE TYPES OF PERSONAL INFORMATION THAT WE COLLECT

The categories of Personal Information we collect will vary, depending on our specific relationship with you and the context. We will not be able to further our relationship with you without certain Personal Information.

Type of Data	Examples	Context
Personal contact details	Your home address, mobile number and personal email address.	We will usually ask for this if you do not currently have office/work contact details and also for customer due diligence purposes.

Use of Your Personal Information

Our Processing of your Personal Information will include obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, copying, analysing, amending, retrieving, using, systemising, storing, disclosing, transferring, retaining, archiving, anonymising, erasing or destroying it by automated or non-automated means.

The UK GDPR as tailored by the Data Protection Act 2018 require us to communicate to you the purposes for which we Process your Personal Information (the “**Permitted Purposes**”), together with the corresponding ‘Legal Basis’. These are summarised in the tables below.

Further details on: (a) security and business continuity arrangements; (b) client due diligence, supplier vetting; and (c) equal opportunities monitoring and reporting, can be found in ‘The types of Personal Information that we collect’ section above.

General Permitted Purposes

We Process Your Personal Information for one or more of the following general Permitted Purposes.

Legal Basis	Permitted Purpose
Where it is necessary to perform our contract with you or to take steps at your request to enter into the contract	For example: (a) to perform our services if you are a client (including related client files management; order/matter acceptance, modification and processing) (b) to enter into or perform our agreement with you if you are a supplier or external adviser or partner (including supplier account management; purchase order processing; and for payment of invoices); or (c) to enter into or perform any other contract/agreement we may have with you.
Where it is necessary for compliance with a legal obligation	For example: (a) to carry out internal and related entity conflicts and other regulatory checks on new client matters and to undertake appropriate client due diligence in accordance with anti-money laundering law; (b) to undertake appropriate vetting of suppliers and external advisers (for example, to comply with our obligations under applicable privacy, tax payment and tax evasion, modern slavery, anti-bribery and corruption and confidentiality rules); (c) for equal opportunities monitoring and reporting purposes; (d) to co-operate with our regulators and other public authorities (including by responding to their requests for information; undertaking internal investigations; and complying with our reporting and other professional obligations); and (e) to comply with any other obligation to which we are subject under applicable rules and law.

<p>Where it is necessary for the purposes of our or another party's legitimate interests, except where these are overridden by your interests, rights or freedoms</p>	<p>For example:</p> <ul style="list-style-type: none"> (a) to ensure compliance with our internal policies; (b) for general security and business continuity purposes; (c) for business management and financial planning (including management of suppliers; business process improvement and quality purposes; management reporting and reviewing records; accounting and auditing; and corporate due diligence); (d) for managing insurances, complaints, potential and actual claims; (e) to ensure the effective provision of our services to clients and enhance our business; (f) for the improvement of our business policies and processes; (g) for training and continuing professional development purposes; (h) to manage our network; (i) to organise corporate events and to carry out market research campaigns; (j) to protect, manage and improve our websites, and other services (including:(i) to make sure our websites function as they should; (ii) to recognise you when you return to the websites; and (iii) to analyse how our websites and online services are performing) (k) for any other legitimate purpose communicated to you at the time of collection of your Personal Information. <p>We consider that our legitimate interests and these uses are proportionate, and compatible with your interests, legal rights or freedoms.</p>
<p>Where it is necessary to protect your vital interests or that of another person</p>	<p>For example, the disclosure of your Personal Information to medical staff in the event of medical emergencies.</p>

MARKETING AND COOKIES

We generally rely on our legitimate interests to Process your Personal Information for marketing purposes. We will inform you in advance of sending you marketing or if a related entity will send you marketing material (unless this is reasonably obvious in the circumstances – for example, when you provide us with your business card during a formal meeting). You will be able to opt-out of any marketing email sent by us, by clicking the opt-out link that we include in each email.

Cookies

We may use cookies (small text files placed on your device) and similar technologies on our website and marketing emails to:

1. make sure our website functions as it should;
2. recognise you when you return to the website (for example, to remember your login details so that you do not need to re-enter it on subsequent visits);
3. analyse how our website and online services are performing (for example to understand how people arrive at and use our website so that we can make it more intuitive); and
4. to present you with customised options relating to your interests, based on your previous use of the websites (for example, where you are known to us, we will keep a record of the articles on our website that you have clicked on/downloaded, and use that information to send you material which we have identified as relevant to your interests).

Please note that some of the cookies on our website may be third party cookies (e.g. Google advertising cookies) which we do not control. Please view the relevant website for details of their privacy policy.

If you are concerned about cookies, most web browsers (Safari, Internet Explorer, Chrome etc) now recognise when a cookie is offered and allow you to opt-out of receiving it. You can also delete all cookies that are already on your browser. If you choose to do this, you may have to manually adjust some preferences every time you visit our website and some services and functionalities may not work.

For more information about cookies and how to disable and/or delete them, please visit www.allaboutcookies.org

Where Is Your Personal Information Stored and Who Will It Be Shared?

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

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

We will also at times need to share some of your Personal Information with select third parties, such as:

Persons related to you	Your other agents, consultants, other advisers, counterparties, beneficiaries, trustees, banks and related persons who operate or are based around the world, where you ask us to, or as otherwise necessary for the Permitted Purposes.
Persons related to us	<p>Senior lenders, our agents, consultants and other professionals, suppliers and external agencies/administrators who assist us with legal, administrative, financial, operational and other services, and may have access to certain of your Personal Information as part of their role. These will include, for example:</p> <ul style="list-style-type: none"> (a) IT software, applications and services, including web content management, recruitment and telecommunications services suppliers; website, online portal and client extranet providers; (b) business continuity/disaster recovery and data back-up providers; (c) our file storage and management suppliers; (d) third party due diligence and identity/background verification suppliers; (e) our banks and other financial providers (such as currency exchange, e-billing and outsourced payroll suppliers); (f) our insurers, insurance brokers and lawyers; (g) our auditors and other professionals engaged for audit purposes; (h) debt collection agencies; (i) local lawyers, tax advisors or experts; and (i) other professional advisors. <p>Our suppliers will usually be based in the United Kingdom. Other agents, consultants and professionals may be based in other countries.</p> <p>Entities under common ownership, and potential affiliates and successors in title to our business, who may be based around the world.</p>
Courts/tribunals; and law enforcement, regulatory and public authorities	Where disclosure is required by applicable rules and law, or by any court, tribunal, law enforcement, regulatory, public or quasi-governmental authority or department around the world.
Other involved persons	If you attend an event organised or hosted by us, we may disclose your details to others who attend or participate in the organisation of that event (as notified to you). Any other persons with whom we may interact on your behalf or at your request and/or where this is otherwise necessary in connection with the Permitted Purposes.

We do not disclose (or sell) your Personal Information to any other third parties.

This Processing may involve the transfer (sometimes via cloud computing) of some of your Personal Information to other countries whose privacy laws may not be as comprehensive to those where you are based. Where third party and/or cross-border transfers take place, we will put enhanced confidentiality and information security safeguards in place to ensure the lawfulness of the transfer and protect your Personal Information. For further details, please see the Security of your Personal Information and data breaches section of this Notice below.
Security of Your Personal Information and Data Breaches

We operate technical, non-technical and procedural controls to safeguard your Personal Information (including protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage). In particular:

The use of:

- (a) recognised, reputable and compliant webhosting and platform services such as Dropbox and Microsoft and other recognised and reputable products involved in the storage and protection of our systems and files;
- (b) physical and technical controls on, and monitoring of, access to our premises and systems; and
- (c) Business Continuity and Disaster Recovery Plans.

We only engage reputable suppliers and lenders. Where suppliers and lenders will have access to our and/or our clients' information, they are also made subject to strict contractual provisions requiring them to ensure any Personal Information is kept secure and is only used in accordance with our instructions (or as otherwise and to the extent strictly required by law, if applicable).

Where your Personal Information is transferred to other countries, we will put appropriate safeguards in place to ensure the lawfulness and security of the transfer. All transfers of Personal Information outside of the UK will be based on the EU Commission's standard contractual clauses. We will also put such arrangements in place with third parties as appropriate. Where required under applicable local law, we will seek your consent to the transfer.

We will keep these arrangements under regular review, taking into account security and compliance best practices, current risks, threats, vulnerabilities, mitigating controls, technology, and changes in applicable legal requirements.

However, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Information transmitted to our websites – and any such transmission is at your own risk. Our website may also, from time to time, contain links to third party websites – which are outside of our control and are not covered by this Notice. If you access other websites using the links provided, please check their privacy policy before submitting any Personal Information to them.

Data Breaches

If a data breach (leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, your Personal Information) occurs which is likely to result in a high risk of adversely affecting your rights and freedoms, we will inform you of this without undue delay. Where legally permitted, any such notifications will be made either via email, post or telephone.

How long we keep Your Information

We will only keep your Personal Information in an accessible form which can identify you for as long as we need to for the Permitted Purposes. As retention periods can vary significantly depending on the Permitted Purpose and the relevant jurisdictions concerned, it is not possible for us to commit to an overall retention period for all of your Personal Information held by us. For example, we are under legal obligations to keep certain records for specific periods which will usually extend after the end of a contractual relationship (including minimum statutory retention periods in respect of client due diligence documents – which vary from jurisdiction to jurisdiction).

As a result, we use certain categories and criteria to determine how long we keep certain of your Personal Information, and these are set out below. Where your Personal Information is used for more than one Permitted Purpose, there will be overlapping retention periods in respect of that Information. In such cases, we will retain your Information for the longer of those overlapping retention periods. We will also transfer paper files into, and store them in, electronic format where appropriate.

Type of Personal Information	Retention Period
Personal Information Processed in connection with lending matters	Up to 5 years after the date of the termination of our business relationship, unless: <ul style="list-style-type: none"> (a) otherwise required by applicable law; (b) where required for regulatory, compliance or insurance purposes; (c) where a longer limitation period applies in respect of specific types of actions/documents; and/or in the event of a dispute which requires it to be kept for longer; or (d) there is another legitimate reason which requires it to be kept for longer.
Personal Information relating to suppliers and the services they provide to us	Up to 5 years following the end of our business relationship, unless: <ul style="list-style-type: none"> (a) otherwise required by applicable law; (b) you consent to us storing it for longer; (c) the Information forms part of files which are required to be kept for longer (for example where you were involved in one of our client matters); or (d) where a longer limitation period applies in respect of specific types of actions/documents; and/or in the event of a dispute or other legitimate reason which requires it to be kept for longer.

Where we no longer require your Personal Information, we will take steps to delete or anonymise it. There will be circumstances where certain Information cannot be permanently deleted or anonymised, for example because it is stored in our back-ups for business continuity purposes.

In such cases, we will take appropriate steps to minimise (and pseudonymise where technically practicable) the Personal Information that we hold, and to ensure that it is: (a) not used in connection with any decision involving you; (b) not shared with anyone, except where we are legally required to do so (e.g. following a court order); (c) kept secure and virtually inaccessible; and (d) permanently deleted if, or when, this becomes technically possible.

YOUR RIGHTS

The following privacy rights apply under the UK GDPR as tailored by the Data Protection Act 2018. Although applicable data protection legislation in relevant jurisdictions afford similar rights, there may be circumstances where some of these rights do not apply under or are modified by, local law. Further information can be sought from our privacy contacts. In the event of any inconsistency, the applicable local legislation will prevail.

Right to be informed	You can ask us to provide you with privacy information about how we Process your Personal Information. That information is set out in this Privacy Notice, together with any other specific notices which are provided to you at the time of collection of your Information.
Right of access	You can request us to confirm whether we Process your Personal Information. You can also ask us to access your Personal Information.
Right to rectification and erasure	In the event that we hold inaccurate or incomplete Personal Information, you can ask us to rectify or complete that Information. You can also ask to erase your Personal Information. This right is not absolute and only applies in certain circumstances.
Right to restrict processing	You can ask us to restrict the Processing of your Personal Information (or to suppress it) for a certain period of time. This right is not absolute and only applies in certain circumstances.
Right of data portability	You can ask us to move, copy or transfer your Personal Information back to you or to another person under certain circumstances. This right only applies: (a) to Personal Information you have provided to us as a Data Controller; (b) where the Processing is based on your consent or for the performance of a contract; and (c) when processing is carried out by automated means.
Right to object	You can ask us at any time to stop Processing your Personal Information for marketing purposes. Where there are legitimate grounds to do so, you can also object to us Processing your Personal Information on the basis of our legitimate interests and in certain other situations.
Right to withdraw consent	Where we are Processing your Personal Information on the basis of your consent, you can withdraw that consent at any time.
Rights in relation to automated decision-making and profiling	You have the right to: (a) ensure that any significant decisions affecting you are not made purely by automated means based on an online profile or other information (i.e. a person is involved in the decision-making), and (b) that you can express your views and to challenge the decision. We are also under obligations to ensure that any profiling is undertaken in a fair and transparent way.

For further details about these privacy rights under UK GDPR (including their limitations), please see the **Guide to the UK GDPR on the Information Commissioner's Office website** .

To exercise your rights, please send a written and dated request (a "Request") to **a.rosen1@btinternet.com**. Please note that:

- We will need to verify your identity in order to be able to comply with certain of your Requests.
- When you Request access to your Personal Information, there will be some Personal Information which we are not able to disclose to you, such as documents which include confidential or personal information about another entity or person; documentation relating to management forecasting or planning; legally privileged documents; and copies of references.
- We will not be able to comply with your Request in certain circumstances, for example where your Request is manifestly unfounded or excessive.

We hope to address any enquiry or Request to your satisfaction, but if we do not, you have the right to lodge a complaint with the relevant data protection regulator in the country where you normally live or work, or where an alleged breach of data protection is said to have occurred (such as the Information Commissioners' Office in England)

Contacts And other Important Privacy Information

If you have any queries regarding this Privacy Notice or our processing of your Personal Information, please email us at **arosen@brahamgood.co.uk**