

# Privacy Notice – Dixcart International Limited – CLIENT

## *Introduction*

Welcome to the Dixcart International Limited (“Dixcart”) Privacy Notice (Clients).

This notice relates to the processing of personal data in connection with the provision of professional services and also in connection with business relationships.

If you wish to subscribe to one of our newsletters this can be done via our website [www.dixcartuk.com](http://www.dixcartuk.com). Where you do so your personal data will be processed in accordance with our Privacy Notice (Newsletters), which can be found [here](#).

Dixcart International respects your privacy and is committed to protecting the personal data it collects. This privacy notice will inform you how we collect, use, share and look after personal data in connection with the provision of professional services and in connection with business relationships.

Any reference in this notice to “you” or “your” is a reference to each data subject whose personal data we process in connection with the provision of legal services and/or in connection with business relationships

## *1. Important information and who we are*

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Dixcart collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Controller**

Any reference to “Dixcart Group” means Dixcart Group Limited (Registered in IOM, no. 004595C) of 69 Athol Street, Douglas, IM1 1JE, Isle of Man, Dixcart Group UK Holding Limited (Registered in Guernsey, no. 65357) of Ground Floor, Dixcart House, Sir William Place, St Peter Port, Guernsey, Channel Islands, GY1 4EZ, Dixcart Professional Services Limited (Registered in Guernsey, no. 59422) of Dixcart House, Sir William Place, St Peter Port, Guernsey, Channel

Islands, GY1 4EZ, Dixcart Audit LLP (Company number OC304784) of Dixcart House, Addlestone Road, Bourne Business Park, Addlestone, Surrey KT15 2LE and any subsidiary company from time to time of any of them and each of them is a member of Dixcart Group.

Dixcart Audit LLP and Dixcart International Limited (Chartered Accountants and Tax Advisers) are authorised and regulated by the Institute of Chartered Accountants in England and Wales (ICAEW).

Dixcart International Limited (Surrey Business IT) is an unregulated business.

Dixcart Legal Limited is authorised and regulated by the Solicitors Regulation Authority No. 612167.

We do not have a data protection officer. We have appointed a data privacy manager. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

## **Contact details**

Our full details are:

Dixcart International Limited

Name or title of data privacy manager: Julia Wigram

Postal address: Dixcart House, Addlestone Road, Bourne Business Park, Addlestone, Surrey KT15 2LE

Tel: +44 (0)333 122 0000

Email address: [privacy@dixcartuk.com](mailto:privacy@dixcartuk.com)

Data Subjects whose personal data is processed by us have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **Changes to the privacy notice and your duty to inform us of changes**

This version is effective from the effective date as indicated at the end of this notice. Historic versions (if any) can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## ***2. The data we collect about you***

### **Types of data**

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 (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Attendance Data:** CCTV footage and information completed in the visitor book if you visit our office
- **Contact Data** such as first name, last name, title, email address, postal address, telephone numbers, employer and job title, shareholdings held, officer positions
- **Financial Data:** includes the details of your bank accounts, earnings and other income, assets, capital gains and losses and tax affairs
- **Identity Data:** such as your passport or driving licence, marital status, title, date of birth and gender
- **Other Information** any information you choose to provide to us such as an inability to attend a meeting due to a holiday, publicly available information and other information obtained in connection with the provision of professional services or in connection with business relationships
- **Special Category Data:** such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data
- **Transaction Data** includes details about payments from you and other details of services you have purchased from us
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences

### **If you fail to provide personal data**

This privacy notice only deals with the use of personal data in connection with the provision of professional services and in connection with business relationships.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not

be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you make enquiries about, or instruct us to provide, services.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - **Contact and Financial Data** from other providers of professional or financial services.
  - **Identity and Contact Data** from publicly available sources such as Companies House, Smartsearch and World-Check.
  - **Financial Data** from HM Revenue and Customs.
  - **A client** for whom we provide payroll or company secretarial services, where you are that client's employee, director or other officer.

## How we use your personal data

- We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- Where we need to perform the work we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via post or email. You have the right to withdraw consent to marketing at any time by [contacting us](#).

### 3. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

We have set out how and why we use your personal data in connection with the provision professional services in a table format:

Types of Data	Collection	Use	Lawful basis for processing your data
-Attendance Data -Contact Data -Financial Data -Identity Data Other Information -Special Category Data	-Information you give us by filling in forms or by corresponding with us by post, phone, email or otherwise.  -Information collected from publicly available sources. Information is collected from third parties. By way of example, your employer, other parties relevant to the professional services being provided such as other professional advisers counterparties in transactions and regulators.	-Provide professional services to our client.  -To comply with legal and regulatory obligations.  -To establish, exercise or defend our legal rights.  -To deal with any complaints or queries our client may have.  -Generally in connection with the relationship with our client and/or you (as appropriate).	To enter into and perform a contract with you.  Where it is in our legitimate interests to do so. In particular:  -To enter into and perform a contract with or provide professional advice or services to our client.  -To comply with legal and regulatory obligations.  - to establish, exercise or defend our legal rights.

	-CCTV footage and visitor book information if you visit our office.		-To deal with any complaints or queries our client and/or you (as appropriate) may have generally in connection with the relationship with our client and/or you (as appropriate).  -To comply with a general obligation to which we are subject. In particular: record keeping obligations. legal and regulatory obligations. To conduct client due diligence checks
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We have set out how and why we use your personal data in connection with business relationships in a table format:

<b>Types of Data</b>	<b>Collection</b>	<b>Use</b>	<b>Lawful basis for processing your data</b>
-Attendance Data -Contact Data -Other Information	-Information you give us by corresponding with us by post, phone, email or otherwise.  -Information is collected from publicly available sources. Information is collected from third parties. By way of example, from another professional adviser.  -CCTV footage and visitor book information if you visit our office.	-To develop and maintain relationships with you or the organisation with whom you are connected.  -To manage or operate any contract we have with you or the organisation with whom you are connected.  -To comply with legal and regulatory obligations.  - To establish, exercise or defend our legal rights.	-Where it is in our legitimate interests to do so. In particular:  -Developing and maintaining relationships with you or the organisation with whom you are connected  - For managing or operating any contract we have with you or the organisation with whom you are connected.  To comply with legal and regulatory obligations.to establish, exercise or defend our legal rights.

#### ***4. Sharing of information and international transfers***

Personal data may be transferred to and viewed by any entity within the Dixcart Group in the UK.

Personal data may be transferred to and viewed by any party providing services to us to support the operation of our business, such as IT and other administrative support. These may be outside the European Union; specifically, if you have made an enquiry to us via a form on our website, this service is provided by Ninjaforms who host data in the USA.

Personal data may be transferred to any person within our client organisation or any organisation to whom you are connected.

We may pass your details onto clients or contacts by way of referral and networking where you are a professional service provider.

Personal data may be transferred to third parties in connection with the professional services that we provide. Examples include, but are not limited to, other professional service providers, regulators, authorities, our auditors and professional advisers, service providers, governmental institutions, barristers, foreign counsel, consultants and data room providers.

Personal data may be transferred to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Where you are a professional service provider and we pass your details onto clients or contacts by way of referral and networking they may be outside the UK.

Where we transfer your personal data outside the UK we ensure that it is transferred in accordance with data protection legislation. This can be done in a number of different ways, including:

- transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the relevant UK government authority.
- by using model contractual clauses approved for use in the UK by the relevant UK government authority which give personal data the same protection it has in the UK.
- other means permitted by applicable data protection law.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Please contact us at [privacy@dixcart.com](mailto:privacy@dixcart.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the European Union.

**Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **5. Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing.

We may use your Identity and Contact Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

We may wish to send you our newsletters. The mailing list is stored through Mailchimp. We may also process your data for marketing purposes (including sending marketing communications). The Dixcart International Notice (Marketing) will apply to such processing by Dixcart International (not this notice).

Please click [here](#) for the Dixcart International Privacy Notice (Marketing).

## **6. Opting out**

You can ask us to stop sending you marketing messages at any time by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of service purchase.

## **7. Data retention**

We will retain personal data for as long as we consider is necessary and appropriate to fulfil the purposes for which it is collected, to protect our interests as a law firm and as is required by law and the regulatory obligations to which we are subject.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm

from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and the applicable legal requirements.

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. We will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a

structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please contact us at [privacy@dixcart.com](mailto:privacy@dixcart.com) so that we may consider your request. As a law firm we have certain legal and regulatory obligations which we will need to take into account in considering any request. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). We may also contact you to ask you for further information in relation to your request to speed up our response.

### **No fee usually required**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**Version number:**3

**Date:** 22/02/2023