

Catriona M A Wheeler Notary Public

DATA PROTECTION PRIVACY NOTICE

1. The business of **Catriona M A Wheeler** of **3 The Landings, Burton Waters, Lincoln LN1 2TU United Kingdom** trading as ("**Business**", "**I**", "**me**", "**my**"). The Business is registered with the Information Commissioner's Office ("**ICO**") under number **Z1700351**.
2. If you have any questions about this privacy notice ("**Notice**"), please contact me by email.
3. The Business will process your and third parties' personal data, as further explained below, in the course of providing you with notarial and associated services ("**Services**").
4. I will let you know, by posting on my website or otherwise, if I make any changes to this Notice from time to time. Your continued use of the Services after notifying such changes will amount to your acknowledgement of the amended Notice.

What is Personal Data?

5. "**Personal data**" means any information relating to an identified or identifiable natural person, known as '**data subject**', who can be identified directly or indirectly; it may include name, address, email address, phone number, IP address, location data, cookies and similar information. It may also include "**special categories of personal data**" such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a data subject, data concerning health or data concerning a natural person's sex life or sexual orientation.
6. The Business may process personal data and special categories of personal data which you provide in connection with the Services about yourself and other data subjects, e.g. individuals whose details are included in any materials provided by you to the Business. The Business may obtain information about you and other data subjects from third party service providers, such as due diligence platforms.

How do I use your personal data?

7. The Business will only process personal data, in accordance with applicable law, for the following purposes:
 - (a) **responding to your queries, requests and other communications;**
 - (b) **providing the Services**, including, where applicable, procuring acts from foreign organisations;
 - (c) **enabling suppliers and service providers to carry out certain functions on behalf of the Business in order to provide the Services**, including webhosting, data storage, identity verification, technical, logistical, courier or other functions, as applicable;
 - (d) **ensuring the security of the Business and preventing or detecting fraud;**
 - (e) **administering my Business**, including complaints resolution, troubleshooting of my website, data analysis, testing of new features, research, statistical and survey purposes;
 - (f) **developing and improving my Services;**
 - (g) **complying with applicable law**, including Notary Practice Rules, guidelines and regulations or in response to a lawful request from a court or regulatory body.

The legal basis for my processing of personal data for the purposes described above will typically include:

- processing necessary to fulfil a **contract** that I have in place with you or other data subjects, such as processing for the purposes set out in paragraphs (a) and (b);
- your **consent**, such as processing for the purposes set out in paragraph **Error! Reference source not found.**;
- processing necessary for my or a third party's **legitimate interests**, such as processing for the purposes set out in paragraphs (a), (b), (b), (d), (e) and (f), which is carried out on the basis of the legitimate

interests of the Business to ensure that Services are properly provided, the security of the Business and its clients and the proper administration of the Business; and

- processing necessary for compliance with a **legal obligation** to which I am subject, such as processing for the purposes set out in paragraph (g); and
- any other applicable legal grounds for processing from time to time.

Cookie statement

What exactly are cookies?

8. In order to collect the information including personal data as described in this Notice, I may use cookies and similar technology on my website. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of the Services offered through my website may not function properly if your cookies are disabled.
9. Cookies can be first party or third party cookies.
 - First party cookies – cookies that the website you are visiting places on your device.
 - Third party cookies – cookies placed on your device through the website but by third parties, such as, Google.

The cookies placed on my website

10. I use the following cookies on my website:
 - Strictly necessary cookies. These cookies are essential to enable you to move around my website and use its features. Without these cookies, Services you have asked for cannot be provided. They are deleted when you close the browser. These are first party cookies.
 - Performance cookies. These cookies collect information in an anonymous form about how visitors use my website. They allow me to recognise and count the number of visitors and to see how visitors move around the website when they are using it and the approximate regions that they are visiting from. These are first party cookies.
 - Functionality cookies. These cookies allow my website to remember choices you make (such as your user name, language or the region you are in, if applicable) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. These are first party cookies.
 - Targeting or advertising cookies. These cookies allow me and my advertisers to deliver information more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of advertising campaigns. They remember that you have visited my website and may help me in compiling your profile. These are persistent cookies which will be kept on your device until their expiration or earlier manual deletion.
 - Social Media cookies. These cookies allow you to connect with social media networks such as LinkedIn and twitter. These are persistent cookies which will be kept on your device until their expiration or earlier manual deletion.
11. I may combine information from these types of cookies and technologies with information about you from other sources.

Cookie consent and opting out

12. I assume that you are happy for me to place cookies on your device. Most Internet browsers automatically accept cookies. However, if you, or another user of your device, wish to withdraw your consent at any time, you have

the ability to accept or decline cookies by modifying your browser setting. If you choose to decline cookies, you may not be able to fully experience the interactive features of my website, my platforms and Services.

13. When you arrive on my website a pop-up message will appear asking for your consent to place advertising cookies on your device. In order to provide your consent, please click '*I understand*'. Once your consent has been provided, this message will not appear again when you revisit. If you, or another user of your device, wish to withdraw your consent at any time, you can do so by altering your browser settings otherwise I will assume that you are happy to receive cookies from my website. For more information please visit www.allaboutcookies.org and <http://www.youronlinechoices.com/uk/>.

Disclosure of personal data

14. There are circumstances where the Business may wish to disclose or is compelled to disclose your personal data to third parties. These scenarios include disclosure to:
 - my **suppliers** and **service providers** to facilitate the provision of the Services, including Adie Pepperdine Ltd for processing payments made by you or on your behalf, couriers, translators, IT consultants and legalisation and other handling agents, webhosting providers, identity verification partners (in order to verify your identity against public databases), consultants, for example, in order to protect the security or integrity of my business, including my databases and systems and for business continuity reasons;
 - **public authorities** to carry out acts which are necessary in connection with the Services, such as the Foreign Office;
 - **foreign organisations** to carry out acts which are necessary in connection with the Services, such as Embassies, Consulates and High Commissions;
 - **professional organisations** exercising certain public functions in relation to the notaries profession, such as Chambers of Commerce;
 - **successor or partner legal entities**, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event relating to a Business. In the case of a merger or sale, your personal data will be permanently transferred to a successor company;
 - **public authorities** where I am required by law to do so; and
 - **any other third party** where you have provided your consent.

International transfer of your personal data

15. I may transfer your personal data to a third party in countries outside the country in which it was originally collected for further processing in accordance with the purposes set out above. In particular, your personal data may be transferred to foreign organisations such as foreign Embassies located in the UK or abroad. Such organisations will process personal data in accordance with the laws to which they are subject and international treaties over which the Business has no control.
16. If the Business transfers personal data to private organisations abroad, such as subcontractors, it will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. You may contact me for a copy of such safeguards in these circumstances.

Retention of personal data

17. Your personal data will be retained for as long as is reasonably necessary for the purposes listed above or as required by the law. For example, the Notaries Practice Rules require that that notarial acts in the public form shall be preserved permanently. Records of acts not in public form shall be preserved for a minimum period of 12 years. Please contact me for further details of applicable retention periods. Personal data may for reasons of security and convenience be stored on remote data facilities but in an encrypted form.

Security of personal data

18. The Business will implement technical and organisational security measures in order to prevent unauthorised access to your personal data.
19. However, please be aware that the transmission of information via the internet is never completely secure. Whilst I can do my best to keep my own systems secure, I do not have full control over all processes involved in, for example, your use of my website or sending confidential materials to me via email, and I cannot therefore guarantee the security of your information transmitted to me on the web.

Data subject rights

20. Data subjects have numerous rights in relation to their personal data. For further information about your data protection rights please visit the ICO [website](#).
 - **Right to make a subject access request (SAR).** Data subjects may request in writing copies of their personal data. However, compliance with such requests is subject to certain limitations and exemptions and the rights of other data subjects. Each request should make clear that a SAR is being made. You may also be required to submit a proof of your identity and payment, where applicable.
 - **Right to rectification.** Data subjects may request that I rectify any inaccurate or incomplete personal data.
 - **Right to withdraw consent.** Data subjects may at any time withdraw their consent to the processing of their personal data carried out by the Business on the basis of previous consent. Such withdrawal will not affect the lawfulness of processing based on previous consent.
 - **Right to object to processing, including automated processing and profiling.** The Business does not make automated decisions. The Business may use third party due diligence platforms which provide recommendations about data subjects by automated means. I will comply with any data subject's objection to processing unless I have a compelling overriding legitimate ground for the processing, the processing is for the establishment, exercise or defence of legal claims or I have another lawful reason to refuse such request. I will comply with each valid opt-out request in relation to marketing communications.
 - **Right to erasure.** Data subjects may request that I erase their personal data. I will comply, unless there is a lawful reason for not doing so. For example, there may be an overriding legitimate ground for keeping the personal data, such as, my archiving obligations that I have to comply with.
 - **Restriction.** Data subjects may request that I restrict my processing of their personal data in various circumstances. I will comply, unless there is a lawful reason for not doing so, such as, a legal obligation to continue processing your personal data in a certain way.
 - **Right to data portability.** In certain circumstances, data subjects may request the controller to provide a copy of their personal data in a structured, commonly used and machine readable format and have it transferred to another provider of the same or similar services. To the extent such right applies to the Services, I will comply with such transfer request. Please note that a transfer to another provider does not imply erasure of the data subject's personal data which may still be required for legitimate and lawful purposes.
 - **Right to lodge a complaint with the supervisory authority.** I suggest that data subjects contact me about any questions or complaints in relation to how I process personal data. However, each data subject has the right to contact the relevant supervisory authority directly.