



## PRIVACY POLICY / NOTICE:

Selwynco and our affiliated businesses (collectively, "Selwynco Group," "we," "our") are committed to being responsible custodians of the personal information that we collect in the course of operating our business as a global provider of legal and other services.

This Privacy Policy ("Notice") describes how we collect, use, share, or otherwise process personal information as a data controller in the course of operating our business, particularly in association with our marketing and business development practices and the operation of our main website ([www.selwynco.com](http://www.selwynco.com)), and our other digital properties that link to this Notice, including our websites, mobile applications, and digital communications (collectively, "Digital Services").

While we may also process personal information during our legal representation of a client, such processing is performed on behalf of and at the direction of our client, subject to our client agreements and professional responsibilities, and is not covered by this Notice.

"Personal information" as used in this Notice means information that identifies, relates to, describes, or can reasonably be linked, directly or indirectly, to a specific natural person. It does not include information that is considered anonymous, de-identified, or aggregated by applicable law.

### 1. The Types of Information We Collect

The types of personal information we collect about you depend on your interactions with us and are described below.

#### Information You Provide to Us

We collect personal information that you provide to us. For example, we may collect personal information when you contact us, request that we send you newsletters, alerts, or other materials, register for a webinar or event, fill out a form, respond to a survey, comment on a blog, or otherwise communicate with us.

Depending on the context of your interactions with us, the categories of personal information we may collect from you include:

- Unique Identifiers that we can use to identify you as a unique individual, such as your name, telephone number, postal or e-mail address, bar license number, social media identifiers, signature, and government issued identification numbers (such as your social security number or passport number). If you have registered with a Digital Service, we may also collect your account username and password.
- Demographic Information, which may include sensitive personal information or information about protected classifications, such as your age, gender, race, sexual orientation, marital status, or veteran status.

Professional and Educational Information related to your occupation, such as your current or previous employers, your job title, or other information about the organization with which you are affiliated. You might also provide information about your professional qualifications or your education, such as degrees, fields of study, the institutions you've attended, languages, professional memberships, qualifications, and certifications.

- Health Information, such as accessibility requirements and dietary restrictions.
- Geolocation Information, such as your city, state or province, and country. When you access the Digital Services, we may collect precise geolocation information if you permit the Digital Services to access such information so that we may provide you with content based on your location and your proximity to our offices.
- Audio and Visual Information, such as your voice and likeness as captured in photographs, video, or audio recordings if you attend our events, visit our offices, or leave us a voicemail.
- User Content, such as comments or other material you post to our social media pages, blogs, or other forums on our Digital Services.
- Preferences, such as your stated interests, how frequently you wish to receive our newsletters, or other communications.
- Any other information you choose to provide.

You generally can use our Digital Services without providing us with personal information, though we may still collect personal information automatically as described in the next section.

### Information We May Collect Automatically or Generate

We may automatically collect and generate information from and about you when you interact with us or our Digital Services, which may include the following categories of personal information:

- **Unique Identifiers:** We might automatically collect information that uniquely identifies you or the device through which you interact with our Digital Services, such as your name, e-mail address, username, social media identifiers, IP address, and device and mobile advertising identifiers.
- **Device Information:** We might automatically collect information pertaining to the device through which you interact with our Digital Services, such as the type of device used to interact with the Digital Services, that device's operating system and version, your browser type.
- **Interaction Information:** We might automatically collect information about your interaction with our Digital Services, such as the content you view and features you access on our Digital Services, the pages you view immediately before and after you access our Digital Services, whether and how you interact with content available on our Digital Services, and the search terms you enter on our Digital Services. We might also collect information about the events and materials in which you have indicated interest or for which you have registered or requested.
- **Geolocation Information:** We might automatically collect information regarding your location, such as your postcode, city, county, country, or general geographic location as derived from your device data (such as your IP address).
- **Inferences drawn from your interactions with our Digital Services,** the events you choose to attend, or any of the other personal information available to us.

We and our service providers or third parties engaged on our behalf may use cookies and similar tracking technologies (collectively, "Cookies") to

collect information from and store information on your device when you use, access, or otherwise interact with our Digital Services. For information about how we use Cookies and the choices you may have, please see our Cookies Policy.

We do not currently respond to "Do Not Track" signals.

### Information We Collect From Other Sources

We may obtain personal information from other sources, such as our clients, employees, or business partners, or from business contact databases and enrichment services. We may also receive information about you from social media platforms, such as when you interact with us on those platforms or access our social media content. We may collect information about you from publicly available sources, such as public social media profiles, publications, and other websites or materials available through search engines.

We may collect the following categories of information from these other sources:

- Unique Identifiers, such as name, telephone number, postal or e-mail address, social media identifiers, and device and mobile advertising identifiers.
- Professional and Educational Information about your occupation and professional activities, such as professional licenses held, employers, business contact information, or information about your education, such as your degrees, fields of study, institutions attended, languages, professional memberships, qualifications, and certifications.
- User Content you post or make available online, such as your social media posts or publications.

## 2. How We Use The Information We Collect

We may use the information we collect for the various purposes, including:

- To respond to your inquiries or communications.
- To provide you with legal and other services.
- To operate, troubleshoot, and improve the Digital Services.

- To send you newsletters, legal updates, marketing communications, and other information or materials that may interest you.
- To expand and maintain our list of contacts.
- To manage your online account(s) with our Digital Services and send you technical notices, updates, security alerts, and other administrative messages.
- To understand how people use our services, including by generating and analyzing statistics.
- For Selwynco's business purposes, including internal administration, data analysis, billing, and detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.
- To advertise, provide, and assess the effectiveness of our events, promotional campaigns, publications, and services.
- As we believe reasonably necessary or appropriate to comply with our legal obligations, to respond to legal process or requests for information issued by government authorities or other third parties, or to protect your, our, or others' rights.

We may use anonymous, de-identified, or aggregate information that does not reasonably identify you for any purpose, as permitted by applicable law.

### 3. How We May Share the Information We Collect

Selwynco does not sell your personal information. We also do not share personal information that reasonably identifies you with unaffiliated entities for their independent use except when we have your permission, are doing so at your direction, as needed to comply with our legal obligations, as permitted by applicable law, or as otherwise described in this Notice.

We may also disclose the categories of information we collect to the following categories of recipients in furtherance of the purposes described above:

- Our affiliates: We may share information with our group businesses entities located in jurisdictions around the world for any of the purposes listed above.
- Our service providers: We may share information with third parties that perform services on our behalf, such as web-hosting companies, mailing vendors, analytics providers, event hosting services, and information technology providers.
- Law enforcement, government authorities, or third parties with legal rights: We may share information as may be permitted or required by the laws of any jurisdiction that may apply to us, as provided for under contract, or as we deem reasonably necessary. In these circumstances, we strive to take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organisation, unless prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.
- Parties in connection with a business transaction: We may share information with service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets, as well as any bankruptcy or corporate reorganisation.
- Others with your consent or at your direction, including if we notify you that your information may be shared and you provide such information or if you use Selwynco to interact with a third party. For example, we may share your name and contact information with a business partner who co-sponsors an event you attend or publication you sign up for or with a social media service if you share or like our content.

We may share anonymous, de-identified, or aggregate information that cannot reasonably identify you with others for any purpose, as permitted by applicable law. Please note that any personal information that you post to a profile, blog, comment section, or forum on our Digital Services or social media pages may be available to other users of those forums or, in some cases, made publicly available.

#### 4. Grounds for Processing Your Information

Where applicable law requires us to justify our processing activities, we rely on the following legal grounds:

- **Performance of a contract:** We may need to collect and use your personal information to enter into a contract you or to perform a contract that you have with us. For example, when you use our Digital Services we will use your personal information to respond to your requests and provide you with such services.
- **Consent:** Where required to obtain your consent, we will do so. To withdraw your consent to such use, you can contact us via our Contact Us page, or, with respect to precise location information, you may be able to disable the sharing of location information in your browser or mobile application settings. Where required by applicable laws, we will rely on your consent for direct marketing and to collect information from your device or computer.
- **Legitimate interests:** We may use your personal information for our legitimate interests to improve our products and services, as well as the content on our Digital Services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use technical information and personal information for our marketing purposes.
- **Legal obligation:** We may process personal information as necessary to comply with our legal obligations.

## 5. Third-Party Services and Content

Our Digital Services may include integrated content or links to content provided by third parties (such as video materials). This Privacy Notice does not address the privacy, security, or other practices of the third parties that provide such content.

Consistent with applicable law, we engage third parties that support the operation of our Digital Services, such as analytics providers. These third parties may track your online activities over time and across different websites and applications. Please see our Cookies Policy for more information about such third party providers and your choices.

## 6. Protection and Storage of the Information We Collect

We deploy commercially reasonable administrative, technical, and

physical safeguards designed to comply with applicable legal requirements and safeguard the information that we collect. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your personal information that they will protect such information with safeguards designed to provide a level of protection equivalent to those adopted by Selwynco.

However, no information system can be 100% secure. We cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

The Digital Services are controlled and operated by Selwynco from within the United Kingdom. We may store the information we collect in the United Kingdom or in other countries where we or our service providers have facilities. We may transfer information to countries outside of your country of residence, including the United Kingdom, which may have data protection laws and regulations that differ from those in your country.

Any transfers of information originating from within the European Economic Area, the United Kingdom, and Switzerland to countries outside the EEA, UK, or Switzerland will normally be made on the basis of the model clauses approved by the European Commission for transfers from EU controllers to non-EU controllers, which may be found at the Commission's website at <https://ec.europa.eu>.

We retain the information we collect no longer than as reasonably necessary to fulfill the purposes for which we collect the information and to comply with our legal obligations.

## 7. Your Choices and Rights

### Marketing Communications.

If you no longer wish to receive marketing communications from us, you can let us know by contacting us using the information available in the How to Contact Us section below. Our digital marketing communications may provide unsubscribe or opt-out mechanisms that allow you to modify your communications preferences.

Please note that if you opt-out of marketing communications, we may still contact you with non-promotional communications, such as those about



ongoing business relations or administrative messages.

Cookies.

For information about the choices you may have in regard to our use of Cookies, please see our Cookies Policy.

Geolocation Data.

If you have previously consented to sharing precise geolocation information with our Digital Services, you can choose to stop the collection of this information at any time by changing the preferences on your browser or mobile device settings.

Push Notifications/Alerts.

If you have permitted one of our mobile applications to send you push notifications or alerts, you can deactivate these messages at any time in the notification settings on your mobile device.

Privacy Rights.

Selwynco operates in various jurisdictions that impose varying obligations and that grant individuals differing levels of protection, particularly with respect to personal information. Depending on applicable law, you may have certain rights with respect to your personal information, including, for example, the rights to:

- Request access to certain personal information of yours that we process.
- Update or correct your personal information if you believe it is incomplete or inaccurate.
- Erase or delete your personal information, subject to certain exceptions under local law.
- Object to our processing of your personal information or otherwise restrict our processing activities.
- Restrict certain transfers of your personal information to third parties.
- Withdraw your consent to processing, where we base our processing of your personal information on consent.
- Not be denied goods or services for exercising your rights under

- applicable law.
- Complain to your local regulatory authority.

You can exercise your rights (if applicable) by submitting a request through our Contact Us page or emailing our Data Protection Officer at [dpo@selwynco.com](mailto:dpo@selwynco.com)

## 8. Limitation owing to Virtual Private Networks (VPN)

It is now common place for users to engage a VPN service when accessing digital services. Selwynco reserves all rights in connection with this Privacy Policy Notice if it is the case that you use a VPN service.

## 9. How to Contact Us

We welcome your inquiries and comments. But please note that if you are not a client, we may not be able to treat the information you send us as confidential.

If you wish to contact us regarding our services please do so through our Contact Us page. If you would like to contact us with questions about our privacy or data protection practices, please contact our data protection officer at [dpo@selwynco.com](mailto:dpo@selwynco.com) or send us an email via our Contact Us page.

## 10. Changes to this Privacy Notice

We may update this Notice periodically, and will revise the date of this Notice to reflect the date when such update occurred. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will endeavor to provide you with notice before such changes take effect, such as by posting prominent notice on the Selwynco website.

Date: October 2020

Signed:

Martin Selwyn  
Chairman

Richard Selwyn  
Managing Director