

Creative Places – privacy notice

Introduction

Welcome to the Creative Places LLP's privacy notice.

Creative Places respects your privacy and is committed to protecting your personal information. This privacy notice will let you know how we look after your personal information generally as well as when you visit our website and tell you about your privacy rights and how the law protects you.

This privacy notice aims to give you information on how Creative Places LLP collects and processes your personal data. It is intended to cover all of your rights and information required under new data laws (GDPR) that come into effect on 25th May 2018 but we may need to update the information. We may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until after 25th May 2018 as we are still working towards getting our systems ready for some of these changes.

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.

Who are we?

Creative Places LLP is the controller and responsible for your personal data (collectively referred to as "Creative Places" "we", "us" or "our" in this privacy notice).

Creative Places has the associated companies listed below. If we need to share your personal information with any of these companies then for the purposes of this privacy notice, Creative Places will also refer to the relevant associated company.

Group Companies:
Bidwells LLP

What data do we collect about you?

We collect and process a range of personal information.

We will collect your full name and contact details (such as phone number, email address and postal address) from you whenever you deal with us.

When we provide our services to you, or on your behalf, where we are required to do so by law, we will collect information relating to your identity, which will be at least one form of photographic identification (such as a passport, a driving licence or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill).

The types of personal information we collect about you usually falls into the following categories:

- Identity and contact information from our direct interaction with clients and contacts in order to provide our professional services
- Financial information which may include bank account details
- Contact information from our clients and contacts in order to engage in direct marketing, keep you up to date on the services we offer and other issues that may be of interest to you
- From each visitor to our web site, we may automatically collect personally identifiable technical information about your visits, which includes information about your internet service provider, browser type, operating system, pages accessed on our sites and online sources, and the date and time of access in order to optimise your user experience and enhance your time spent with us online. We also receive information telling us which site you came to our site from. Of course, we may also collect details you post to our website or those of other sites and social media platforms. Our website and online services use cookies to distinguish you from other users. This helps us to provide you with a better experience and also allows us to improve our site and services. We also may collect non-personally identifiable information when you access and use our website. We are not responsible for the data collection, privacy practices or policies of any third-party websites that we may link to or that may link to our websites. We encourage you to read the privacy policy of every website you visit.

For the above purposes, a client includes any organisation or individual who is identified as a client on Creative Places systems (regardless of whether we charge any fees) and a contact includes any individual who is a contact of the firm whether a representative of a client or a former or prospective client, any supplier, consultant, another professional adviser, intermediary or agent.

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 requested from us but we will notify you if this is the case at the time.

We may need to collect information from third party sources (for example, to verify your identity). The third party is responsible for your information and its disclosure to us and you should always check that privacy notices and statements from any entity that makes available information about you.

In relation to the technical information we collect, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

How do we use your personal information?

The law requires us to ensure we have a lawful basis for processing your personal information. This is usually because it is necessary for:

- the performance of a contract that you enter in to with us; and/or
- our legitimate interests or those of a third party; and/or
- compliance with a legal obligation.

Sometimes, we may ask you to consent to our collection and use of certain of your personal information. Where this is the case, you can change your mind and withdraw your consent at any time by e-mailing us at enquiries@creativeplaces.com

In relation to direct marketing, you can always opt out of receiving our marketing messages – see below.

Why do we use your personal information?

We use your personal information for the purposes listed below.

- delivering our services to our clients in relation to our professional services and fulfilling our contractual obligations in this regard
- undertaking our client checks and assessing whether to do business with a client or contact
- managing activities related to your services
- fulfilling and responding to requests from you or made on your behalf
- tailoring, developing, improving our services
- communications with our clients and contacts including:
 - marketing and promotional messages
 - surveys
 - providing information relating to matters that may be of interest to clients and contacts
 - notifications of events and new services
 - newsletters
- for our internal business management and operational purposes
- ensuring content from our web site is presented to you in the most effective manner for you and for your computer.

Who do we share your personal information with?

Your data may be accessed by and shared with all members of the Creative Places group of companies who are all committed to complying with the terms of this privacy notice.

We may need to share your details with others in order to perform our services to you. For example, we may need to deal with professional advisers, agents, brokers, lenders and other parties on your behalf and in connection with our services, depending on the nature of the services you would like us to deliver.

A number of third party service providers are engaged by Creative Places to assist in the operation of our business and the running and maintenance of our systems. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service. We ensure we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We may share aggregated data with service providers who provide us with reports on industry trends and other information to assist us in supplying our services to our clients.

We may release your information to third parties beyond the above only if we are required to do so by law (e.g. by a court order) or in connection with the prevention of fraud or other crime.

How can you opt out of direct marketing?

You can ask us to stop sending you marketing messages at any time by:

- following the opt-out links on any marketing message sent to you
- contacting us at any time at the details or below or via enquiries@creativeplaces.com

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the provision of our services or other transactions with us.

How do we protect the personal information you provide to us?

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 are putting 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.

How long will you keep my information?

We will not to keep your personally identifiable information in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes. This means that data will be destroyed or erased from our systems or anonymised when it has reached the applicable retention period.

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 whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep certain basic information about our clients for at least fifteen years after they cease being clients.

Will you transfer my information overseas?

Personally identifiable information may be transferred outside of the European

Economic Area (“EEA”) to other third parties as set in the section above, and we will ensure that adequate protection is provided for that data as required under data protection laws.

What happens to your personal information on a change of control of our business?

In the event of a business change in control resulting from, for example, a sale to, or merger with, another entity, we may transfer your personally identifiable information to the new party in control.

What rights do I have in relation to my personal information?

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. You also have the right to object where we are processing your personal data for direct marketing purposes. 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.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to make a formal request for information we hold about you or to make changes to the data we hold about you or to opt-out of being contacted for sales or marketing purposes then you can contact us at enquiries@creativeplaces.com or as set out below. You may also use these contact details to ask questions or raise concerns about the privacy policy

Changes and updates to this privacy notice

This notice was last updated in May 2018.

We may change or update this notice from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this notice.

How can you contact us and/or complain?

Please contact us with any queries in relation to your personal information and how we use it.

Our full details are:

Full name of legal entity: Creative Places LLP

Name or title of data privacy manager: Director of Compliance

Email address: enquiries@creativeplaces.com

Postal address: 3 King's Parade, Cambridge, CB2 1SJ

You 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us first.