**PRIVACY POLICY**

**Becca Barr Management Limited**

**Introduction**

Welcome to the BBM's privacy policy.

BBM respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please use the Glossary below to understand the meaning of some of the terms used in this privacy policy.

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

**Purpose of this privacy policy**

This privacy policy aims to give you information on how BBM collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or use any of our services.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

**Controller**

**Becca Barr Management Limited** (Company number 06650755), whose registered office address is at 207a Castelnau, Barnes, London, England, SW13 9EA, is the controller and responsible for your personal data (collectively referred to as **“BBM”**, **“we”**, **“us”** or **“our”** in this privacy policy).

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

**Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: **Becca Barr Management Limited**

Email address: **[DETAILS]**

Postal address: **[DETAILS]**

Telephone number: **[DETAILS]**

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator 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 policy and your duty to inform us of changes**

We keep our privacy policy under regular review. 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.

**Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

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

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, share and transfer different kinds of personal data relating to you in the course of the services we provide. The data we will need to collect from you in order for us to be able to provide you with our services may include the following:

(a) Your name and contact details including address, telephone number, mobile telephone number, email address, marital status, title, date of birth and gender.

(b) Where you are located.

(c) Information about your online presence (for example LinkedIn, Twitter), whether you have linked to us or our Facebook or LinkedIn page.

(d) Professional or trade-related information.

(e) Information required by us in order to enable us to check and verify your identity (for example for anti-money laundering purposes or generally as a means of helping to prevent fraud). This may include passport details, driving licence details and date of birth.

(f) Information as to the matter concerning which we providing our services.

(g) Information required by us in order to carry out a financial or credit check.

(h) Financial details relating to you, including details of your bank account if money is, or is likely to need to be, sent to you, billing information and credit card details.

(i) Technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website (**Technical Data**).

(j) Usage data including information about how you use our website, products and services.

(k) Marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity.

We do not collect any **Special Categories of Personal Data** about you (this includes 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). Nor do we collect any information about criminal convictions and offences.

Please note that failure to provide the personal data requested may prevent us from acting for you and/or delay the provision of services.

**If you fail to provide personal data**

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

**3. How is your personal data collected?**

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

(a) **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:

(i) apply for our products or services;

(ii) create an account on our website;

(iii) subscribe to our services or publications;

(iv) request marketing to be sent to you;

(v) enter a promotion or survey; or

(vi) give us feedback or contact us.

(b) **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

(c) **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources, including:

1. analytics providers, advertising networks and search information providers;
2. providers of technical, payment and delivery services;
3. data brokers or aggregators; and
4. publicly available sources, such as Companies House and the Electoral Register based inside the UK.

**4. 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:

(a) Where we need to perform the contract we are about to enter into or have entered into with you.

(b) 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.

(c) Where we need to comply with a legal obligation.

See the Glossary, Lawful Basis to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

Data protection law requires that we only use your personal data for the purposes for which it was acquired, or where we have a proper reason for using it. Those reasons may include the following:

(a) Where you have given consent to the use of your personal data for one or more specific purposes.

(b) Where the use is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.

(c) Where the use is necessary for compliance with a legal obligation that we are subject to.

(d) Where the use is necessary in order to protect your vital interests or those of another person.

(e) Where the use is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in us.

(f) Where the use is necessary for the purposes of our legitimate interests or those of a third party, except where those interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you or the relevant person is a child.

The reasons set out above represent the general position as to the purposes for which data may be used. The specific position in relation to your personal data, however, is that we may use it for the following purposes:

(a) To provide our services to you so that we can comply with our contract with you or take any steps that it is necessary for us to take before entering into a contract with you.

(b) To prevent or detect fraud, either against you or against any other person involved in any matter in which you are involved. This will help to prevent any damage either to you, a third party, or to us.

(c) To carry out identity checks, and to undertake information gathering and audits, as required by regulatory bodies to comply with any legal and/or regulatory obligations to which you or we are subject.

(d) To undertake financial, embargo/sanction list and other security checks, and such other processing activities as are required for legal and regulatory compliance generally or specifically by your, or our, regulator(s).

(e) To gather and provide any information required by, or relating to, audits, enquiries or investigations by your, or our, regulator(s).

(f) To comply with our internal business policies, and for operational reasons such as security, confidentiality, competency and efficiency control, training and client care. This will help us to deliver the best services to you.

(g) For audits and external quality reviews in relation to standards adopted by us.

(h) For statistical analysis to enable us better to manage our business, for example in relation to our financial performance and customer base.

(i) For maintaining and updating records to ensure accuracy of processing.

(j) To comply with legal and regulatory obligations to make information returns to regulators and legally-constituted bodies.

(k) To ensure safe working practices, and for staff administration and assessment purposes.

(l) For marketing our services and those of selected third parties if agreed to by you to existing and former clients and third parties.

(m) For credit control and credit reference checks in relation to the services we perform.

**Contacting you**

In addition to the general matters dealt with in the **“Purposes for which we will use your personal data”** section above, we may also need to send you updates concerning our services, and about relevant developments in relation to you, our services, or other related matters which might concern you or be of interest to you. This may be by post, telephone, email or text, and may include information about the services we offer, and information relating to changes in those services.

We regard ourselves as having a legitimate interest in processing your personal data for these purposes, and we take the view that we do not require your consent in order to do so. From time to time we undertake what are known as ‘legitimate interest assessments’ in order to balance our interests in contacting you with your interests in relation to your data. Where we believe that consent is required, we will contact you specifically for this, and will do so in a clear and transparent manner.

Where you have agreed to us doing so we may also send you information about third party services in which you have expressed an interest, or which are relevant to any services that we have supplied.

Be assured that we treat your personal data with the utmost respect and will never share it with others for marketing or promotional purposes. You have, at all times, the right to request that we do not contact you for any purpose other than providing our services. We may however require that you confirm your marketing preferences from time to time so that we can be sure that your views remain the same, especially in relation to issues such as legal and regulatory updates.

**Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**Opting out**

You can ask us or third parties 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 a product/service purchase, product/service experience or other transactions.

**Our use of cookies and other information-gathering technologies**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. The information is used to track visitor use of the website and to compile statistical reports on website activity. For further information about cookies visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). 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 this website may become inaccessible or not function properly.

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the **“Purposes for which we will use your personal data”** section above.

(a) External Third Parties as set out in the Glossary.

(b) 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 policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the 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 be aware that, from time to time, we may be required to disclose your personal data to, and exchange information about you or relating to you with, government, law enforcement and regulatory bodies and agencies in order to comply with our own legal and regulatory obligations.

During the course of, and sometimes following the conclusion of, our provision of services to you we may need to share your personal data with other third parties, for example those involved in a relevant or related transaction. We will only share that information which it is necessary and relevant to share.

From time to time, it may be necessary for us to share data for statistical purposes (for example with our regulatory body). We will always take steps to try to ensure that information shared is anonymised, but where this is not possible, we will require that the recipient of the information keeps it confidential at all times.

**6. International transfers**

We do not transfer your personal data outside the UK.

**7. Data security**

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.

**8. Data retention**

**How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data: see **“your legal rights”** below for further information. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

**9. Your legal rights**

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

(a) **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.

(b) **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.

(c) **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.

(d) **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.

(e) **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:

(i) If you want us to establish the data's accuracy.

(ii) Where our use of the data is unlawful but you do not want us to erase it.

(iii) 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.

You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

(f) **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.

(g) **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 exercise any of the rights set out above, please contact us.

**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 could 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 could 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.

**10. Glossary**

**LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product 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.

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

**THIRD PARTIES**

**External Third Parties** means:

(a) Service providers who provide IT and system administration services.

(b) Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

(c) Third parties involved in the matter which we are dealing with, such as financial services providers, banks, building societies, registrars.

(d) HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.