

## JO HUMPHREY NOTARY PUBLIC - DATA PROTECTION PRIVACY NOTICE

1. The business of **Jo Humphrey Notary Public** (“Business”, “we”, “us”, “our”). The Business is registered with the Information Commissioner’s Office (“ICO”) under number ZA 225995.
2. If you have any questions about this privacy notice (“Notice”), please contact us by [email](#).
3. The Business will process your and third parties’ personal data in the course of providing you with notarial services (“Services”).
4. We will let you know by posting on our website if we make any changes to this Notice from time to time.

### 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. The Business may obtain information about you and other data subjects from third party service providers. If you use our online Services, the Business may collect information about your devices including clickstream data.
6. The provision of certain personal data is mandatory in order for the Business to comply with mandatory client due diligence requirements and consequently to provide the Services. You warrant that such personal data is accurate, complete and up to date. Failure to comply may result in documents being rejected by the relevant certification authorities, held invalid in the destination country or other difficulty to successfully completing the Services.
7. In relation to personal data of data subjects you warrant to the Business on a continuous basis that:
  - where applicable, you are authorised to share such personal data with the Business in connection with the Services and that wherever another data subject is referred to, you have obtained the explicit and demonstrable consent from all relevant data subjects to the inclusion and use of any personal data concerning them;
  - to the extent this is required in connection with the Services, such personal data is accurate, complete and up to date.

### How do we use your personal data?

8. The Business will only process personal data, in accordance with applicable law, for the following purposes:
  - responding to your queries, requests and other communications;
  - providing the Services, including, where applicable, procuring acts from foreign organisations;
  - 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;
  - allowing you to use features on our website, when you choose to do so;
  - sending you personalised marketing communications requested by you
  - ensuring the security of the Business and preventing or detecting fraud;
  - administering our Business, including complaints resolution, troubleshooting of our website, data analysis, testing of new features, research, statistical and survey purposes;
  - developing and improving our Services;
  - complying with applicable law.

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

- processing necessary to fulfil a contract that we have in place with you or other data subjects;
- your consent;
- processing necessary for our or a third party’s legitimate interests, 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 we are subject and any other applicable legal grounds for processing from time to time.

9. In order to collect the information including personal data as described in this Notice, we may use cookies and similar technology on our website.
10. We use the following cookies on our website and we assume that you are happy for us to place cookies on your device:
  - Strictly necessary cookies. These cookies are essential in order to enable you to move around our 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.
  - 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.

#### **Disclosure of personal data**

11. 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:
  - our suppliers and service providers to facilitate the provision of the Services, including 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 our business, including our 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 or where we are required by law to do so;
  - 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; and
  - any other third party where you have provided your consent.

#### **International transfer of your personal data**

12. We 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.

#### **Retention of personal data**

13. Your personal data will be retained for as long as is reasonably necessary for the purposes listed above or as required by the law.

#### **Security of personal data**

14. The Business will implement technical and organisational security measures in order to prevent unauthorised access to your personal data.

#### **Data subject rights**

Data subjects have numerous rights in relation to their personal data. For further information about your data protection rights please visit the ICO [website](#). Data subjects may make requests in relation to their personal data in accordance with their legal rights.