

THE ASSOCIATION OF PANDEMIC LAWYERS
PRIVACY NOTICE AND COOKIE POLICY

This Notice applies when you visit our website www.panlaw.org.

This Privacy Notice does not apply to information you might provide or which might be collected in the context of the provision of legal services. Where our Association Members ("Members") are instructed by you to provide legal services, then the individual member or members will be the controllers of the data you provide, and their Client Privacy Notice will apply.

Please read the following information carefully. This privacy notice contains information about the information collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who the Association shares this information with, the security mechanisms the Association has put in place to protect your information and how to contact Association in the event you need further information

Data protection principles

The Association adheres to the following principles when processing your personal information as data controller:

1. Lawfulness, fairness and transparency – data must be processed lawfully, fairly and in a transparent manner.
2. Purpose limitation - data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data minimisation - data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Accuracy - data must be accurate and, where necessary, kept up to date.
5. Storage limitation - data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information are processed.
6. Integrity and confidentiality - data must be processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

Information we may collect

Information you provide us with:

You may choose to provide us with personal data when we are in contact by phone, email, via. our website or otherwise.

The categories of personal information you provide may include:

- first and last name;
 - job title and company name;
 - email address, phone number and mailing address
 - marketing and communications data including your preference in receiving marketing from us and your communication preferences;
 - any other identifier that permits the Association to make contact with you;
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- any personal details included in potential instructions to a member of the Association the Chambers.

Information we collect online

We collect, store, and use information about your visits to our website and about your computer, tablet, mobile or other device through which you access the website. This includes the following information:

- technical information, including the Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location; and
- information about your visits and use of the Site, including the full Uniform Resource Locators (URL), clickstream to, through and from our Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and website navigation and search terms used.

Sensitive categories of ("Sensitive") personal data:

The Association does not generally seek to collect sensitive personal information through our website. Sensitive personal information is information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; health or sex life, sexual orientation; genetic or biometric information. If we do collect sensitive personal information, we will ask for your explicit consent to our proposed use of that information at the time of collection.

Children

Our website is not intended for or directed at children under the age of 16 years, and we do not knowingly collect data relating to children under this age.

How we use your information

As a data controller, the Association will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis for which we carry out each type of processing is explained in the table below.

Purposes for which we will process the information	Legal Basis for the processing
To provide you with information and services that you request from us.	It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To send you alerts, newsletters, bulletins, announcements, and other communications concerning the Association, legal developments or notifications we believe may be of interest to you.	It is in our legitimate interests to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you. You can always opt-out of receiving direct marketing-related email communications by following the unsubscribe link.

<p>To invite you to seminars, events, or other functions we believe may be of interest to you.</p> <p>It is in our legitimate interests to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.</p> <p>You can always opt-out of receiving direct marketing-related email communications by following the unsubscribe link.</p>
<p>To send you information regarding changes to our policies, other terms and conditions and other administrative information.</p> <p>It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.</p>
<p>To administer our website including troubleshooting, data analysis, testing, research, statistical and survey purposes;</p>
<p>To improve the website to ensure that content is presented in the most effective manner for you and your computer, mobile device or other item</p>

of hardware through which you access the website; and

To keep our website safe and secure.

For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of the website and to ensure network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.

Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences by contacting us by phone or email.

The Association will only use your personal information for the purposes for which we have 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 we need to use your personal information for an unrelated purpose, we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

Email Marketing

For email marketing to an individual subscriber (that is, a non-corporate email address), we need your consent to send you unsolicited email marketing.

Where you provide consent, you can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal.

You have the right to opt out of receiving email marketing communications from us at any time by:

- contacting using the contact details set out on our website panlaw.org; or
- using the "unsubscribe" link in emails.

Third party processors

We will not sell, distribute, rent, lease or otherwise share your personal information other than as outlined in this Privacy Notice or without obtaining your consent beforehand.

We will share your personal information with the following third parties:

- our service providers who assist with the running of our website and our office services including our diary management services,

accountancy and banking services, IT support services, data storage and back up services, and email security services.

Our third party processors are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

In addition, the Association may disclose information about you:

- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation;
- if necessary to protect the vital interests of a person;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets.

International transfers

Where necessary for the establishment, exercise or defence of legal claims, your personal data may be transferred, stored, and processed, outside of the European Economic Area. Regardless of where your personal data is transferred, we will ensure that your personal data is safe and shall take all steps reasonably necessary to put in place appropriate safeguards to ensure that your personal data is treated securely and in accordance with this Notice and applicable law. Details regarding these safeguards can be obtained by contacting enquiries@panlaw.org.

Security of your information

The Association take information security seriously and want to outline the ways in which we protect your data:

- data encryption;
- digital signatures;
- firewalls;
- intrusion detection systems;
- strong security procedures across all service organisations.

Despite these precautions, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted over the internet or that unauthorised persons will not obtain access to personal information. In the event of a data breach, the Association have put in place procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where required to do so.

If you have any questions about security on our website, you can contact us at enquiries@panlaw.org.

How long we keep your personal data

Your personal information will not be kept for longer than is necessary for the purposes for which it was collected and processed.

The criteria we use for retaining different types of personal information, includes the following:

- **General queries** - when you make an enquiry or contact us by email or telephone, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal information for longer than two years if we have not had any active subsequent contact with you;
- **Direct marketing** - where we hold your personal information on our database for direct marketing purposes, we will retain your information for no longer than two years if we have not had any active subsequent contact with you.

Your rights

Access to and updating your personal data

You have the right to access information which we hold about you ("data subject access request").

You may also have the right to receive personal information which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller ("data portability"). The right to data portability only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. Please keep us informed if your personal information changes during your relationship with us.

Right to object

Direct marketing

You have the right to object at any time to our processing of your personal information for direct marketing purposes.

Where we process your information based on our legitimate interests

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which

override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Your other rights

You also have the following rights under data protection laws to request that we rectify your personal information which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal information erasure (“right to be forgotten”);
- restrict the processing of your personal information to processing in certain circumstances.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

Exercising your rights

You can exercise any of your rights as described in this Notice and under data protection laws by contacting us as detailed above.

Save as described in this Notice or provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either:

1. charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
2. refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

Links

Our website may, from time to time, contain links to and from third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and the Association does

not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to our clients' needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

What cookies are used on this website?

In order to improve the site, we may use small files commonly known as "cookies". A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your "device") from the Sites and is stored on your device's browser or hard drive.

The cookies we use on the site will not collect personally identifiable information about you and we will not disclose information stored in cookies that we place on your device to third parties.

By continuing to browse the site, you are agreeing to our use of cookies.

If you do not want us to use cookies when you use the site, you can set your internet browser not to accept cookies. However, if you block cookies some of the features on the site may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

The tables below explain the cookies we use:

We only use "Google Analytics" on the website. This cookie provides us with a visitor count and an understanding of how visitors move around and use the site. We can then use this information to improve navigation and usability. The cookies we use will not collect personally identifiable information about you and we will not disclose information stored in cookies that we place on your device to any third parties.

We are obliged by Google Analytics to state the following:

The site uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the site analyse how users use the site. The information generated by the cookie about your use of the site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the sites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the site. By using the site, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy statement applicable to the website in question.

Email monitoring

Emails which you send to us or which we send to you may be monitored by us to ensure compliance with professional standards and our internal compliance policies. Monitoring is not continuous or routine but may be undertaken on the instruction of the Executive Committee where there are reasonable grounds for doing so.

Complaints

You should address your complaints to our The Executive Committee at enquiries@panlaw.org.

In addition, you have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/>) about our data processing activities in relation to your personal information if you think they infringe applicable data protection laws (ICO helpline on **0303 123 1113**).

Changes to the Notice

We may change this Privacy Notice from time to time. The current version will always be available from us in hard copy or on our website. We will post a prominent notice on our website to notify you of any significant changes to this Notice or update you by other appropriate means.