

Alexandra Kaleniuk Immigration Consulting

Privacy & Data Protection Policy

Last Updated: 21 June 2020 by Alexandra Kaleniuk

1. We value and respect your rights to privacy and data protection and handle any data provided to us by third parties in accordance with all applicable laws and regulations including the General Data Protection Regulation ("GDPR"). We are registered with the Information Commissioner's Office as a data controller, under registration number A8469424.

2. In respect of personal data processed when you use our website, we are the regulated controller and are permitted to collect or otherwise process your personal data in the following ways:

- When you provide your personal data on a contact form.
- When you contact us by other means, such as email, telephone or text.
- In the form of information provided by your web browser, through the use of cookies or similar software.

3. Any personal data that you give to us may be retained by us to provide a requested service, or for our legitimate interests as a business. You do not have to give us any of your personal data in order to use most of our website or associated online systems including our database systems other than in accordance with your explicit instructions to advise or assist you with a specific UK Immigration or nationality application or legal matter. Our database of personal details is used by us for the purposes of our business and will never be passed to third parties without your permission (unless we are required by law to do so for example in the interests of national security).

4. In respect of any digital or other mailings we will not send you such marketing unless you have consented to receive it, and we will always offer you the option to opt out of any future marketing. We do not rent, sell or otherwise disclose your personal data to any other third party without your express permission.

5. Any personal data provided or collected as a result of visiting our website will be stored for six months after the most recent activity recorded. You have the right at any time to:

- request from us access to, and rectification or erasure of, personal data;
- request that we restrict processing concerning you;
- object to our processing of the data;
- complain to the Information Commissioner's Office about the manner in which, or otherwise, in which we process your personal data.

6. If you have any questions or concerns regarding your personal data or how it is used, please contact us. To help us keep your personal data up-to-date, you should let us know should any of your contact details change, or if you notice any inaccuracies in them. From time to time we may contact you to confirm that the data we hold for you is correct.

7. In the event that you engage us to advise or assist you with an immigration matter you will need to provide us with personal data about yourself (and possibly others) for the purposes of our engagement. Such data may include your name, address, date of birth, passport or other identification documentation, contact numbers and email, bank account details, assets, family details including the names and ages of any children (where appropriate). We may also obtain from you and public resources the names, age, address and other details of anyone involved with your matter. Any such personal data may be used by us for the provision of our legal services, billing and other administrative purposes (including the processing of any such data as part of those services or so as to improve the delivery of similar services in the future). It may also be

used by us from time to time to provide you (and where appropriate anyone for whom you act) with information about our firm and our services (including contacting you or them).

8. If you are the representative of any legal entity other than an individual, we will use any personal data you provide to us for the purposes of acting, on the same basis as set out above. It is your responsibility to ensure that you have appropriate procedures in place (including adequate privacy notices) when you ask us to collect and process personal data for the purposes of your matter. If you have any concerns about the status of such data you must let the individual know before any such data is shared with us.

9. The legal basis for the processing of the personal data you provide under the General Data Protection Regulation (GDPR) is primarily that it is necessary preparation for or needed for the performance of our agreed services. Some of our processing will also take place on the basis that it is necessary for the purposes of our legitimate interests, and those interests are not, in the circumstances, overridden by your interests or fundamental rights and freedoms. If you do not wish to receive information about us and our services, wish to receive only certain kinds of information, or wish to receive information only by a particular method, please use the unsubscribe function on our communications or otherwise inform us accordingly.

10. None of the information we hold about you will be disclosed to third parties except in accordance with paragraph 3 above or for the purpose of managing our database or other client management systems or improving our business. If, as part of our services, we collect personal data about other people on your behalf, we will hold and process that data in accordance with our privacy and data protection policy and the prevailing data protection legislation. If, in our view, certain of that personal data should not be held or processed by us we will return or delete it as appropriate (and technologically practicable).