



Arvo Law Limited – Privacy Notice

This privacy notice gives you information that is required under UK GDPR and the Data Protection Act 2018, about how Arvo Law Limited (“we” or “us”) uses your personal data through your use of this website, portals, products and services. We are the controller for your personal data. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us by email at info@arvolaw.co.uk.

1. What information we collect, use, and why

1.1 We collect or use the following information to provide and improve products and services for clients:

- Names and contact details
- Addresses
- Pronoun preferences
- Occupation
- Date of birth
- Payment details (including card or bank information for transfers and direct debits)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Information relating to compliments or complaints
- Records of meetings and decisions
- Account access information
- Website user information

1.2 We collect or use the following personal information for the operation of client or customer accounts:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Marketing preferences
- Technical data, including information about browser and operating systems

1.3 We collect or use the following personal information for the prevention, detection, investigation or prosecution of crimes:

- Names and contact information
- Client accounts and records

1.4 We collect or use the following personal information for information updates or marketing purposes

- Names and contact details



- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

1.5 We collect or use the following personal information for research or archiving purposes:

- Names and contact details
- Addresses
- Purchase or client account history
- Website and app user journey information
- IP addresses

1.6 We collect or use the following personal information to comply with legal requirements:

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations

1.7 We collect or use the following personal information for dealing with queries, complaints or claims

- Names and contact details
- Addresses
- Payment details
- Account information
- Purchase or service history
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Correspondence

2. Our lawful bases for the collection and use of your data

2.1 Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. We have set out the lawful basis below.

2.2 Our lawful bases for collecting or using personal information to provide and improve products and services, and for the operation of client or customer accounts for clients are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

2.3 Our lawful bases for collecting or using personal information to comply with legal requirements and prevention, detection, investigation or prosecution of crimes are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

2.4 Our lawful bases for collecting or using personal information for information updates or marketing purposes are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

2.5 Our lawful basis for collecting or using personal information for research or archiving purposes:

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

2.6 Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your



data protection rights may apply, except the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

2.7 Marketing:

- (a) **Direct marketing:** Often, when your personal data is collected, you may be asked to indicate your preferences for receiving direct marketing communications from us. In addition, you may receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing.
- (b) **Third-party marketing:** We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.
- (c) **Opting out of marketing:** You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you, or by contacting us using the contact details set out above. If you opt out of receiving marketing communications, you will still receive other service-related communications.

2.8 **Automated decision-making / profiling:** We do not use automated decision-making or profiling in relation to your personal data. No decisions that produce legal or similarly significant effects concerning you are made by automated means.

3. Where we get your personal information from

3.1 We use different methods to collect your personal data from and about you, including:

- (a) Directly from you
- (b) Publicly available sources
- (c) Market research organisations
- (d) Providers of marketing lists and other personal information

4. How long we keep your information

4.1 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.

4.2 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.

4.3 For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

5. Who we share your information with and where your data is held

5.1 We share your information with the parties listed below:

- (e) Debt collection agencies
- (f) Insurance companies, brokers or other intermediaries
- (g) Professional or legal advisors
- (h) Insolvency practitioners
- (i) Regulatory authorities
- (j) Organisations we're legally obliged to share personal information with
- (k) Suppliers, subcontractors and service providers
- (l) Professional consultants
- (m) Third parties

5.2 Your personal data may be held at our offices and those of third parties described in section 5.1. Some of these third parties may be based outside of the country in which we originally received the personal data (the "Originating Country").

5.3 Whenever we transfer your personal data out of the Originating Country to countries which have laws that do not provide protection at the same level as the laws of the Originating Country, we always ensure that a similar degree of protection is afforded to it by using safeguards that are deemed adequate under applicable laws.

5.4 **Third-party links:** Our website and our products and services 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 notice of every website you visit.

6. Data security

6.1 We maintain administrative, physical, and technical safeguards and security measures designed to ensure the security of personal data. 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.

7. Your legal rights

7.1 You have a number of rights under data protection laws in relation to your personal data. These rights are set out below:

- (a) **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- (b) **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- (c) **Your right to erasure** - You have the right to ask us to delete your personal information.

- (d) **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.
- (e) **Your right to object** – you have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data. You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- (f) **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- (g) **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

7.2 To make a data protection rights request, please contact us using the contact details at the top of this privacy notice. If you make a request, we must respond to you without undue delay and in any event within one month.

7.3 **Fees:** You will not usually 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.

7.4 **Verification:** 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.

8. How to complain

8.1 If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

8.2 If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO. The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>