

Privacy Notice

Introduction

This privacy notice sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. This notice also details the way this website processes, stores and protects user data and information.

CDN Limited (“the Company”) will process your and third parties’ personal data, as further explained below, in the course of providing you with Consular services, processing export documentation, regulatory affairs and healthcare, I.P.and legal affairs documentation including access to our website and online features (“Services”).

We will let you know, by posting on our website or otherwise, if we make any changes to this notice from time to time. Your continued use of the Services after the notification of such changes will amount to your acknowledgement of the amended notice.

The website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with all UK national laws and requirements for user privacy.

Use of cookies

What are cookies?

Cookies are small files saved to the user’s computer’s hard drive that track, save and store information about the user’s interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards. We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features.

This website uses tracking software to monitor its visitors to understand better how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer’s hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

For more information please visit www.allaboutcookies.org and <http://www.youronlinechoices.com/uk/>.

Personal information

“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. It may also include “special categories of personal data” such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a data subject, data concerning health or data concerning a natural person's sex life or sexual orientation.

The Company may process personal data and special categories of personal data which you provide in connection with the Services about yourself and other data subjects, e.g. individuals whose details are included in any materials provided by you to the Company. The Company may obtain information about you and other data subjects from third party service providers, such as GDPR compliant suppliers. We will ensure that all personal information supplied is held securely in accordance with the Data Protection Act 1998 and any subsequent enactment thereof.

The provision of certain personal data is mandatory in order for the Company to comply with mandatory client due diligence requirements and consequently to provide the Services. You warrant on a continuous basis 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 in successfully completing the Services.

In relation to personal data of other data subjects you warrant to the Company on a continuous basis that:

- where applicable, you are authorised to share such personal data with the Company 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; and
- either you provide your explicit consent and warrant that each data subject has provided explicit consent for the transfer of personal data to foreign organisations in connection with the Services, or that an alternative legal gateway for such transfer (such as transfer necessary for the conclusion or performance of a contract concluded in the interest of the data subject) has been satisfied.

You have the right at any time to request a copy of the personal information we hold on you.

Information collection and use

How do we collect information?

The Company will only process personal data, in accordance with applicable law, for the following purposes:

- a) responding to your queries, requests and other communications;
- b) providing the Services, including, where applicable, procuring acts from foreign organisations;
- c) enabling suppliers and service providers to carry out certain functions on behalf of the Company in order to provide the Services, including webhosting, data storage, identity verification, technical, logistical, courier or other functions, as applicable;
- d) allowing you to use features on our website, when you choose to do so;
- e) ensuring the security of the Company and preventing or detecting fraud;
- f) administering our Company, including complaints resolution, troubleshooting of our website, data analysis;
- g) developing and improving our Services;
- h) complying with applicable law, guidelines and regulations or in response to a lawful request from a court or regulatory body.

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, such as processing for the purposes set out in paragraphs (a), (b) and (d);
- your consent, such as processing for the purposes set out in paragraph (b);
- processing necessary for our or a third party's legitimate interests, such as processing for the purposes set out in paragraphs (a), (b), (c), (e), (f), (g) and (h), which is carried out on the basis of the legitimate interests of the Company to ensure that Services are properly provided, the security of the Company and its clients and the proper administration of the Company; and
- processing necessary for compliance with a legal obligation to which we are subject, such as processing for the purposes set out in paragraph (e) and (h). and
- any other applicable legal grounds for processing from time to time.

How long do we keep your data for?

CDN Limited will not retain your personal information longer than necessary. We will hold onto the information you provide either while your account is in existence, or as needed to be able to provide the Services to you.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain

some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

- Your personal data will be retained for as long as is reasonably necessary for the purposes listed above or as required by the law. For example, the Notaries Company Rules require that that notarial acts in the public form shall be preserved permanently. Records of acts not in public form shall be preserved for a minimum period of 2 years. It is currently our policy to keep files between 2 and 3 years depending on the nature of the transaction. Please contact us for further details of applicable retention periods. Personal data may for reasons of security and convenience be stored on remote data facilities but in an encrypted form.
- We may keep an anonymised form of your personal data, which will no longer refer to you, without time limits, to the extent that we have a legitimate and lawful interest in doing so.

Disclosure of personal data

There are circumstances where the Company 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 systems and for business continuity reasons;
- external service providers which are necessary in connection with the Services, including IFAs, Accountants, Notaries Public and Counsel
- public authorities to carry out acts which are necessary in connection with the Services, such as the Foreign Office, Courts and Tribunals;
- 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, such as Chambers of Commerce;
- public authorities where we are required by law to do so; and
- any other third party where you have provided your consent.

We warrant that we will not sell your data to any third parties.

International transfer of your personal data

- 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 Company has no control.
- If the Company transfers personal data to private organisations abroad, such as subcontractors, it will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. You may contact us for a copy of such safeguards in these circumstances.

Choosing how we use your data

We understand that you trust us with your personal information and we are committed to ensuring you can manage the privacy and security of your personal information yourself.

For further information about your data protection rights please visit the ICO [website](#).

With respect to the information relating to you that is in our possession, and recognising that it is your choice to provide us with your personally identifiable information, we commit to giving you the ability to do all of the following:

- Subject Access Request. You can request in writing copies of your personal data by contacting Tracey Lewis on 0333 800 0100 or: data.controller@cdn-consular.co.uk. However, compliance with such requests is subject to certain limitations and exemptions and the rights of other data subjects. Each request should make clear that a Subject Access Request is being made. Our security procedures mean that we may request proof of identity before we reveal information, including your e-mail address and possibly your address. You may also be required to submit payment, where applicable.
- Right to rectification. You can request that we rectify any inaccurate or incomplete personal data. To do so, you can contact us by the same method. However, we may retain archived copies of your information as required by law or for legitimate business purposes (including to help address fraud and spam).
- Right to withdraw consent. You may at any time withdraw your consent to the processing of your personal data carried out by the Company on the basis of previous consent. Such withdrawal will not affect the lawfulness of processing based on previous consent.
- Right to object to processing, including automated processing and profiling. The Company does not make automated decisions. The Company may use third party due diligence platforms which provide recommendations about data subjects by automated means. We will comply with any objection to processing unless we have a compelling overriding legitimate ground for the processing, the processing is for the

establishment, exercise or defence of legal claims or we have another lawful reason to refuse such request.

- Right to erasure. You can request that we erase your personal data. We will comply, unless there is a lawful reason for not doing so. For example, there may be an overriding legitimate ground for keeping the personal data, such as, our retention obligations that we have to comply with.
- Right to data portability. In certain circumstances, you may request us to provide a copy of your personal data in a structured, commonly used and machine readable format and have it transferred to another provider of the same or similar services. To the extent such right applies to the Services, we will comply with such transfer request. Please note that a transfer to another provider does not imply erasure of the data subject's personal data which may still be required for legitimate and lawful purposes.
- Right to lodge a complaint with the Information Commissioner's Office. We suggest that data subjects contact us about any questions or complaints in relation to how we process personal data. However, you have the right to contact the relevant supervisory authority directly.

The data controller is CDN Limited, who can be contacted on 0333 800 0100 or info@cdn-consular.co.uk.

The Data Protection Representative is Tracey Lewis who can be contacted on 0333 800 0100 or data.controller@cdn-consular.co.uk

Security of personal data

The Company will implement technical and organisational security measures in order to prevent unauthorised access to your personal data. However, please be aware that the transmission of information via the internet is never completely secure. Whilst we will do our best to keep our own systems secure, we do not have full control over all processes involved in, for example, your use of our website or sending confidential materials to us via email, and we cannot therefore guarantee the security of your information transmitted to us on the web.

Please note, we are constantly reviewing how we process and protect data. Therefore, changes to our policy may occur at any time. We will endeavour to publicise any changes.