

Privacy Policy – VETH Ltd (VETH)

VETH values the privacy of those who provide Personal Data to it and recognises the importance of protecting Confidential Information. This privacy and confidentiality policy (the “Policy”) describes how and why we collect, store and use Personal Data and Confidential Information, and provides information about individuals’ rights.

This Policy applies to both Personal Data supplied to VETH either by an individual or by others and to Confidential Information supplied by clients or prospective clients. We may use Personal Data and Confidential Information supplied to us for any of the purposes as set out in this Policy, or as otherwise disclosed at the point of collection.

This Policy is an important document. We recommend that you read it carefully and retain a copy for your future reference.

In this Policy, we use the terms:

“Confidential Information” refers to information supplied to VETH by a client or prospective client, which is identified as being confidential at the time of disclosure or would be regarded as confidential by a reasonable person or is protected by a regulatory obligation of confidentiality;

“Engagement Letter” refers to a written document which sets out the terms and conditions of the engagement of VETH and which describes the services to be provided to you by VETH;

“Personal Data” has the meaning set out in EU Regulation 2016/679 (the “GDPR”). This includes any information about an individual from which that person can be identified;

“we”, “us”, and “our” (and other similar terms) refer to VETH (company number **11972798**) with registered office of **203 Filwood Green Business Park, Bristol, England, BS4 1ET** . When dealing with Personal Data, VETH will be the data controller as prescribed under UK law (the “Data Controller”);

“you” and “your” (and other similar terms) refer to – as the relevant context dictates – our clients, individuals associated with our clients, contacts, suppliers, job applicants and staff.

Your rights in relation to Personal Data and how to exercise them

Under certain circumstances you have the following rights:

- the right to ask us to provide you, or a third party, with copies of the Personal Data we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- the right to request erasure, anonymisation or blocking of your Personal Data that is processed in breach of the law;
- the right to object on legitimate grounds to the processing of your Personal Data. In certain circumstances we may not be able to stop using your Personal Data. If that is the case, we’ll let you know and explain why; and
- withdrawal of consent – when Personal Data is processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Data where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership).

To exercise such rights and if you have any questions about how we collect, store and use Personal Data, then please contact us using the details as set out in the “Data Controller contact information” section below.

What basis do we have for processing your Personal Information?

We will only process Personal Data where we have a lawful reason for doing so. The lawful basis for processing Personal Data by us will be one of the following:

- the processing is necessary for the performance of a contract you are party to or in order to take steps at your request prior to you entering into a contract;
- the processing is necessary in order for us to comply with our legal or regulatory obligations (such as compliance with anti-money laundering legislation and for conflict checking purposes);
- the processing is necessary for the pursuit of our legitimate business interests (including that of the delivery and the promotion of our services);
- processing is necessary for the establishment, exercise or defence of legal claims; or
- the data subject has given consent to the processing of his or her Personal Data for one or more specific purposes

What Personal Data do we collect and process?

We aim to be transparent about why and how we collect and process Personal Data. For further information on our processing activities please review the relevant section below:

Business contacts

VETH processes Personal Data about contacts which it has obtained via communication with those contacts by virtue of providing services, or at a networking event. The Personal Data may include: name, email address, job title, telephone number, area of business, job role, jurisdiction, language, seniority and other business contact information.

Use

For contact and communication purposes: we may use your contact information to send you HR updates that we may circulate from time to time, news about any events we are organising or participating in, and/or other information about us and the services provided by VETH. You can specify your contact preferences by emailing the email address in the “Data Controller contact information” section below.

Retention

Personal Data is retained for as long as it is necessary for the purposes set out above (being the length of the business relationship). If a business contact requests to be forgotten their contact details will be deleted.

Clients and individuals associated with clients

We request that our clients only provide Personal Data which is necessary for us to carry out our services.

If we need Personal Data in respect of individuals associated with clients in order to provide legal services, we ask our clients to provide this Policy to the data subjects.

In the majority of circumstances, we will collect Personal Data from our clients or from third parties acting on behalf of our clients.

Use

Providing HR services: we will use and disclose Personal Data in such a manner as we believe is reasonably necessary to provide our services, for example we may need to liaise with others (such as employment lawyers and insurance providers) on your behalf (including correspondence with you), to liaise with other professional service providers in relation to matters that we are handling, or because we need to liaise with specific parties on a matter you have instructed us on.

Administration: to collect our fees or costs in connection with other legal enforcement, we will use Personal Data to agree payment arrangements, and to collect our fees and costs owing to us in connection with legal enforcement.

Managing client relationships: providing clients with information on our services and HR updates that we consider may be relevant to them; arranging and hosting events; and identifying where we may make improvements in service delivery.

Client engagement: as part of our client onboarding process we carry out certain background searches to verify whether or not there are any potential issues that may mean we cannot work with a particular person (for instance to identify criminal convictions, politically exposed persons, sanctions or other potential reputational issues).

Compliance with relevant regulations: this may include use of your Personal Data (e.g. evidence of your identity) in order to fulfil our obligations to check the identity of our clients in compliance with anti-money laundering law and regulations. Personal Data provided for the purposes of compliance with our anti-money laundering obligations will only be used for the purposes of preventing money laundering and terrorist financing or as permitted by or under law unless you have consented to its use for any other purpose.

Retention

Our general retention period for documentation created for the purpose of providing legal services is 13 years. In some instances, there are legal and regulatory exceptions which may require documentation to be held for longer or shorter periods. In particular, we are required to retain customer due diligence documentation for 5 years after completion of any transaction or the end of the business relationship with you and for no longer than 10 years unless you have consented to its retention for a longer period, or a longer period is required under any relevant regulation or for the purposes of court proceedings. If you require further information, please contact us using the details as set out in the "Data Controller contact information" section below.

Suppliers (including individual contractors)

Personal Data, including name, email address, telephone number and other business contact information, is collected to receive services from suppliers, to manage the relationship with the supplier, and for the provision of services to our clients.

Use

To receive services from our suppliers: we will use and disclose Personal Data in such manner as we believe is reasonably necessary to receive and to review the provision of those services from suppliers.

Services to clients: if a supplier is assisting us in delivering services to our clients, we will process Personal Data to manage that relationship.

Administration: to agree payment arrangements with our suppliers, and to make payments to them.

Retention

A general retention period of 13 years will be applied unless there are any legal and or regulatory exceptions which may require documentation to be held for shorter or longer periods. If you require further information, please contact us using the details as set out in the “Data Controller contact information” section below.

Who else may have access to your Personal Data?

On occasion, we may need to share your Personal Data with third parties. We will only share Personal Data where we are legally permitted to do so.

Where you supply us with Personal Data as a client, we will assume, unless you instruct us otherwise in writing, that we can disclose your Personal Data in such manner as we believe is reasonably necessary to provide our services (including as described in this Policy), or as is required under applicable law. This might be because, for example, we may pass your Personal Data to third parties such as:

- credit-checking agencies for credit control reasons;
- events: we may need to pass on your Personal Data (e.g., name, company, occupation) to a third party in connection with management of an event, in which case the details will only be used by the third party for that specific purpose;
- business partners, service providers and other affiliated third parties: to enable us to provide our services to you, we may need to share your Personal Data with our business partners (including other professional advisers such as accountants or auditors), external service providers and/or overseas counsel. Our arrangements with external service providers currently cover the provision of support services including IT (including but not limited to our cloud technology providers), AML/CDD checks, events management, document production, business and HR research, and secretarial services;
- disclosures required by law or regulation: in certain circumstances, please note that we may be required to disclose Personal Data under applicable law or regulation, including to law enforcement agencies or in connection with proposed or actual legal proceedings.

International transfers of Personal Data

If we need to transfer your Personal Data outside of the UK (for example in order to obtain overseas legal/HR advice) we will discuss this with you at the time and prior to any such transfer being made.

How we deal with your Confidential Information

On occasion, we may want to share your Confidential Information with third parties. We will only share Confidential Information where we are legally permitted to do so.

Where you supply us with Confidential Information, we will assume, unless you instruct us otherwise in writing, that we can disclose your Confidential Information in such manner as we believe is reasonably necessary to provide the services which you have requested from us or as is required under applicable law. Examples of where this may be applicable include the following:

- business partners, service providers and other affiliated third parties: to enable us to provide our services to you, we may need to share your Confidential Information with our business partners (including other professional advisers such as accountants or auditors), external service providers and/or overseas counsel. Our arrangements with external service providers currently cover the provision of support services including IT (including but not limited to our cloud technology providers), AML/CDD checks, events management, document production, business and HR research and secretarial services;
- disclosures required by law or regulation: in certain circumstances, please note that we may be required to disclose Confidential Information under applicable law or regulation (for instance, for the purposes of completing conflict checks and anti-money laundering checks), to law enforcement agencies, or in connection with proposed or actual legal proceedings.

How we look after your Personal Data and Confidential Information

We have in place appropriate technical and organisational security measures to protect your Personal Data against unauthorised or unlawful use, and against accidental loss, damage or destruction.

We put in place strict confidentiality agreements (including data protection obligations) with our third party service providers.

Updates to this Policy

This Policy was last updated in January 2023. Please check back regularly to keep informed of updates to this Policy.

Data Controller contact information:

VETH Limited
49 Theydon Grove
Epping, Essex CM16 4PX
Email: vicky@veth.co.uk
ICO Registration Reference -ZB305468

Complaints

While we hope that you will not need to, if you want to complain about our use of Personal Data please send an email detailing your complaint to the above email address.

You also have the right to lodge a complaint with the relevant supervisory authority. Please see further details below:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire SK9 5AF
www.ico.org.uk
Tel: 0303 123 1113
Tel: 029 2067 8400 (calls in Welsh)
Email: casework@ico.org.uk