



Privacy Policy

This Privacy Policy sets out how we, Bridgewood & Neitzert Ltd, obtain, store and use your personal information when you use or interact with our website, <https://bridgewoodandneitzert.london/> (our **website**), or where we otherwise obtain or collect your personal information. The effective date of this Privacy Policy is 15th March 2018.

Please read this Privacy Policy carefully. We recommend that you print off a copy of this Privacy Policy and any future versions in force from time to time for your records.

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Our details

The data controller in respect of our website is Bridgewood & Neitzert Ltd Registered in England & Wales No. 06197611 of 146 Stoke Newington Church Street, London, N16 0JU. You can contact the data controller by writing to the company at the above address or sending an email to admin@bridgewoodandneitzert.london

If you have any questions about this Privacy Policy, please contact the data controller.

How we collect or obtain personal information about you

We collect personal information about you when you provide it to us, such as through your use of our website and its features, when you contact us directly by email, phone, in writing, or via social media, when you order goods and services, when you use any of our other websites or applications or any other means by which you provide personal information to us. Where permitted or authorised by law, we may also receive information about you from third





parties such as affiliates, business partners, credit and fraud checking agencies, as well as third parties with whom we have had no prior contact. We also collect information about your use of our website through cookies and similar technologies. Our cookies policy sets out more of the information on how we use cookies and similar technologies to collect information about you. You can access our cookies policy via this link:

Personal information we collect or obtain about you

The type of information we collect about you may include information such as:

- your name;
- your email address;
- your address;
- your phone number;
- your payment information (e.g. your credit or debit card details);
- information about your computer (e.g. your IP address and browser type);
- information about how you use our website (e.g. which pages you have viewed, the time you viewed them and what you clicked on);
- information about your mobile device (such as your geographical location)

Information we obtain from third parties will generally be your name and contact details, but may include any additional information they provide to us, including (but not limited to) any of the types of information set out in the list above.

We may also obtain personal information about you from certain publicly accessible sources, including (but not limited to) the electoral register, online customer databases, business directories, media publications, social media, websites and other publicly accessible sources.

Please note that there are circumstances in which we may not be required to provide you with the information contained in this Privacy Policy, for example if you already have the information.

In addition, where we obtain personal information about you from a source other than yourself, we are not required to provide you with certain information contained in this Privacy Policy if:

- you already have the information;
- providing you with the information would prove impossible or would involve a disproportionate effort;
- we are under an EU or EU member state law obligation to obtain or disclose the information which provides appropriate measures to protect your legitimate interests;
- or
- we are obliged to keep the information confidential as a result of an obligation of professional secrecy regulated by EU or EU member state law.



Where we obtain personal information about you from a source other than yourself, and we are required to provide you with that information, we will provide you with the information contained in this Privacy Policy at the following points in time:

- if we intend to use your personal information to communicate with you, at the point when we first communicate with you;
- if we envisage that we will disclose your personal information to a third party, when we disclose your personal information to that third party (at the latest); and
- in any other circumstances, within a reasonable period after obtaining your personal information (and in any event within one month at the latest), taking into account the specific circumstances in which we use your personal information.

How we use your personal information

We may use your personal information for one or more of the following purposes in our legitimate interests or in the legitimate interests of third parties:

- **Administering, running and improving our website and business, including personalising our website experience for you.** This is necessary for our legitimate interest of better understanding our other customers' and potential customers' preferences and tailoring our website, products and services to their needs and preferences.
- **Communicating directly with you in relation to updates to the website, your purchase(s) of our products or services, and in response to enquiries we receive from you.** This will be necessary either to update you from time to time about changes to our website, to perform a contract which we have entered into with you (or to take steps, at your request, to enter into a contract with you) or for our legitimate interest of satisfying and confirming your requirements in order to provide you with our products or services and to answer questions we receive from you.
- **Protecting our business and our business interests, including for the purposes of credit and background checks, fraud prevention and debt recovery.** This is necessary for our legitimate interests of preventing criminal activity such as fraud or money laundering, for ensuring that our website and services are not misused and protecting our business. We will only carry out such checks to the extent that we are permitted or authorised by law to do so.
- **Displaying advertisements to you and analysing the information we receive in relation to those advertisements.** This is necessary for our own and for third parties' legitimate interests of direct marketing and advertising our and their respective products and services.
- **Providing you with offers relating to our products and services which relate to products and services you purchased from us or were in negotiations to purchase from us (provided that you did not opt out from receiving such communications either at the time or subsequently).** This is necessary for our legitimate interest of direct marketing and advertising our products and services.





- **Communicating with our business advisors and legal representatives.** This is necessary for our legitimate interests of obtaining legal or professional business advice, and we will only share your personal information where it is necessary to do so, to the minimum extent necessary and on an anonymised basis wherever possible.
- **Sharing your personal information with third parties which are either related to or associated with us (including to third parties within our corporate group from time to time) such as our business partners, affiliates, associates, suppliers, independent contractors, email provider and IT service providers.** This will be necessary either to perform a contract which we have entered into with you (or to take steps, at your request, to enter into a contract with you), for our legitimate interest of running and managing our business effectively, for compliance with a legal obligation to which we are subject, or for our own direct marketing purposes. Where we share your personal information, we will do so strictly on a need-to-know basis, subject to appropriate confidentiality restrictions, on an anonymised basis as far as possible and only to the extent strictly necessary for any of these purposes.
- **Passing on your personal information to third parties, such as payment service providers, including PayPal, SagePay, 3D secure, Divido, in order to process your payments for goods and services you order from us.** This is necessary for us to perform a contract we have entered into with you (or to take steps, at your request, to enter into a contract with you) and for our and that third party's legitimate interest in processing your payment(s) for goods and services you order from us.
- You can access the privacy policy of PayPal here:
<https://www.paypal.com/en/webapps/mpp/ua/privacy-full>
- SagePay here <https://www.sagepay.co.uk/policies/privacy-policy>
- Visa here <https://www.visaeurope.com/privacy/>
- Barclaycard here <https://www.barclaycard.co.uk/personal/privacy-policy>
- Divido here <https://www.divido.com/legal/privacy>
- **Enforcing our legal rights.** This is necessary for our legitimate interest of protecting our business and enforcing our contractual and other legal rights.
- **Ensuring physical, network and information security and integrity.** This is necessary for our legitimate interest of ensuring that our IT systems and networks are secure and uncompromised, including, for example, preventing malware, viruses, bugs or other harmful code, preventing unauthorised access to our systems, and any form of attack on, or damage to, our IT systems and networks.



- **In connection with disclosure requests and in the case of a business or share sale or sale or purchase of a business and/or assets, whether actual or potential.** This is necessary for our legitimate interests of selling and/or ensuring and promoting the success of our business.
- **Providing statistical information to third parties such as Google Analytics, Bing Analytics.** This is necessary for our and third parties' legitimate interests of processing personal information for research purposes, including market research, better understanding our respective customers, and tailoring our respective products and services to their needs.
- **Indicating possible criminal acts or threats to public security to a competent authority.** This is necessary for our legitimate interest of promoting the success of our business, preventing crime, for compliance with a legal obligation to which we are subject, in the general public interest or for the legitimate interests of governmental bodies and competent authorities that prevent crime.
- **In connection with any legal or potential legal dispute or proceedings.** This is necessary for our legitimate interest of promoting and ensuring the success of our business, resolving disputes and making such disclosures as are required by law or which we consider, acting reasonably, are required by law.

We may process your personal information for the following purpose(s) where we have obtained your consent to do so:

- **To provide you with offers relating to goods and services we offer from time to time.**

Where we process your personal information on the basis of your consent, you can withdraw your consent to such processing at any time by emailing us at admin@bridgewoodandneitzert.london or writing to us at Bridgewood & Neitzert Ltd, 146 Stoke Newington Church Street, London, N16 0JU.

We may also collect or process your personal information for the following purposes:

- **Entering into and performing a contract with you.** Where you wish to purchase products or services from us, we require your personal information in order to enter into and perform a contract with you. If you do not provide your personal information to us when it is required for such a purpose, we will not be able to enter into or perform a contract with you or to provide you with the products or services you have requested. We may also postpone or cancel any orders you place and enforce our legal rights against you (for example, where we have incurred costs or expenses in preparing or fulfilling any orders placed by you but are unable to deliver the order due to your failure to provide the necessary personal information).





- **Complying with laws, regulations and other legal requirements.** We may need to use and process your personal information in order to comply with legal obligations to which we are subject. For example, we may require your personal information pursuant to a statutory obligation to conduct anti-money-laundering checks or to disclose your information to a court following receipt of a court order or subpoena. We may also need your personal information to comply with ongoing legal obligations, such as tax laws and regulations to which we are subject.

How long we store your personal information

We will store your information for no longer than necessary, taking into account the following:

- the purpose(s) for which we are processing your personal information, such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or for our legitimate interests;
- whether we have any legal obligation to continue to process your information, such as any record-keeping obligations imposed by applicable law; and
- whether we have any legal basis to continue to process your personal information, such as your consent.

How we secure your personal information

We take appropriate technical and organisational measures to secure your personal information and to protect it against unauthorised or unlawful use or processing as well as against the accidental loss or destruction of, or damage to, your personal information, including:

- only sharing and providing access to your personal information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your personal information;
- requiring proof of identity from any individual who requests access to personal information[; and]
- using Secure Sockets Layer (SSL) software or other similar encryption technologies to encrypt any payment transactions you make on or via our website;

Transmission of information (including personal information) over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your transmission of information to us by such means.





Our use of cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users of a website.

We use cookies and similar technologies on or via our website. For further information on how we use cookies and similar technologies, including the information we collect through our use of cookies and similar technologies, please see our cookies policy, which is available via the following link: <https://bridgewoodandneitzert.london/wp-content/uploads/2018/03/Cookies-Policy.pdf>

You can reject some or all of the cookies we use on or via our website by changing your browser settings but doing so may impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org

We use Google Analytics on our website to understand how you engage and interact with it. For information on how Google Analytics collects and processes data using cookies, please visit www.google.com/policies/privacy/partners/. You can opt out of Google Analytics tracking by visiting: <http://tools.google.com/dlpage/gaoptout>

We use web beacons [in our marketing emails [and/or] on our website]. For information on how third parties use information gathered from our use of web beacons, please visit *[insert URLs of relevant third parties who you use e.g. your email provider, but only if they use web beacons]*. Some (but not all) browsers enable you to restrict the use of web beacons by either preventing them from sending information back to their source (e.g. when you choose browser settings which block cookies and trackers) or by not accessing the images containing them (e.g. if you select a “do not display images (in emails)” setting in your email server).

Transfers of your personal information to other countries and safeguards used

We do not and will not transfer any personal information outside the EEA

Your rights in relation to your personal information

You have the following rights in relation to your personal information, which you can exercise by writing to the following address: Bridgewood & Neitzert Ltd, 146 Stoke Newington Church Street, London, N16 0JU or sending an email to: admin@bridgewoodandneitzert.london

- to request access to your personal information and information related to our use and processing of your personal information;
- to request the correction or deletion of your personal information;
- to request that we restrict our use of your personal information;
- to receive personal information which you have provided to us in a structured, commonly used and machine-readable format (e.g. an Excel spreadsheet) and the right to have that personal information transferred to another data controller (including a third-party data controller);
- to object to the processing of your personal information for certain purposes (for further information, see the section below entitled ‘Your right to object to the processing of your personal information for certain purposes’); and





- to withdraw your consent to our use of your personal information at any time where we rely on your consent to use or process that personal information. If you withdraw your consent, this will not affect the lawfulness of our use and processing of your personal information on the basis of your consent before the point in time when you withdraw your consent.

You also have the right to lodge a complaint with a supervisory authority, which, for the purposes of the UK, is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

For further information about your rights in relation to your personal information, including certain limitations which apply to some of those rights, please see Articles 12 to 23 of the General Data Protection Regulation (GDPR), which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Where you request access to personal information, we are required by law to use reasonable means to verify your identity before doing so. In order for us to verify your identity, we require you to provide us with an original or certified copy of a document from each of the following two categories of documents:

- **Category One:** a full current signed UK or overseas passport, a full current UK or EU photocard driving licence or a national identity card.
- **Category Two:** a copy of your bank statement, utility bill (gas, electric, water, landline phone), TV licence renewal statement or council tax bill with your address, dated no earlier than three months before the date when you request access to your personal information.

Where you provide a certified copy of these documents, these must be certified by an appropriate professional such as a solicitor, accountant, the Post Office's identity checking service, an official at a bank or building society or a regulated financial advisor.

We will not be able to provide you with access to your personal information until you provide us with your proof of identity as set out above and we have been able to successfully verify your identity.

Your right to object to the processing of your personal information for certain purposes

You have the following rights in relation to your personal information, which you may exercise in the same way as you may exercise the rights in the preceding section (*Your rights in relation to your personal information*):

- to object to us using or processing your personal information where we use or process it in order to carry out a task in the public interest, where we do so in the exercise of official authority or for our legitimate interests, including 'profiling' (i.e. predicting your behaviour based on your personal information) based on any of these purposes; and
- to object to us processing your personal information for direct marketing purposes (including any automated evaluation we make about you or any of your characteristics as a person, to the extent that it is related to such direct marketing).





You may also exercise your right to object to us using or processing your personal information for direct marketing purposes by:

- clicking the unsubscribe link contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link; or

sending an email to admin@bridgewoodandneitzert.london, asking that we stop sending you marketing communications or by including the words "OPT OUT".

Whenever you object to direct marketing from us by a different communication method to that of the marketing communications you have received from us, you must provide us with your name and sufficient information to enable us to identify you in relation to the communications you have received (for example, if you have received text messages from us and you wish to unsubscribe by email, we may need you to provide us with your phone number in that email).

Consequences of not providing your personal information to us

Where you wish to purchase products or services from us, we require your personal information in order to enter into a contract with you. We may also require your personal information pursuant to a statutory obligation (in order to be able to send you an invoice for products and services you wish to order from us, for example).

If you do not provide your personal information, we will not be able to enter into a contract with you or to provide you with those products or services.

Changes to our Privacy Policy

We may change our Privacy Policy from time to time without providing prior notice to you. If required by law, we will make such changes to our Privacy Policy known to you by posting a notice on the website and/or by us posting an updated version of our Privacy Policy on our website with a new effective date stated at the beginning of it. By continuing to access our website on or after that effective date, you agree to be bound by that new version of our Privacy Policy.

Where we intend to use your personal information for a new purpose other than the purpose(s) for which we originally collected it, we will provide you with information about that purpose and any other relevant information before we use your personal information for that new purpose and obtain your consent if required.

Changes to your information

Please inform us of any changes to any information (including personal information) which we hold about you so we can keep the information we hold about you accurate and up-to-date.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations





protect the privacy of children using the internet. We do not knowingly contact or collect personal information from children under the age of 13. The website is not intended to solicit information of any kind from children under the age of 13.

It is possible that we may receive information pertaining to children under the age of 13 by fraud or deception. If we are notified of this, as soon as we verify the information, we will immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about children under the age of 13, please do so by sending an email to admin@bridgewoodandneitzert.london.

California Do Not Track Disclosures

“Do Not Track” is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we may use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the website, or one of the affiliated pages. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.

Copyright, credit and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved.

Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted such a template as the basis for our Privacy Policy.

