

# Privacy Policy

Allen & Overy values your privacy and cares about the way in which your personal information is treated.

This policy describes:

- what personal information we collect about you
- how we obtain your personal information
- how we use your personal information
- on what basis we use your personal information
- how long we keep your personal information
- who we share your personal information with
- how we protect your personal information
- which countries we transfer your personal information to
- your rights regarding your personal information

Allen & Overy refers to Allen & Overy LLP, its subsidiaries and other partnerships, corporations, undertakings and entities which are authorised to practice using the name 'Allen & Overy'. See 'Data controllers' below for more information on the entities that control and process personal data in Allen & Overy.

If you need further information or have any questions or complaints about our privacy policy or practices, please contact our Head of Data Privacy using the details set out at the end of the policy.

## What personal information do we collect about you?

We may collect personal information from you in the course of our business, including through your use of our website, when you contact or request information from us, when you engage our legal or other services or as a result of your relationship with one or more of our staff and clients.

The personal information that we process includes:

- Basic information, such as your name (including name prefix or title), the company you work for, your title or position and your relationship to a person
- Contact information, such as your postal address, email address and phone number(s)
- Financial information, such as payment-related information
- Technical information, such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically
- Information you provide to us for the purposes of attending meetings and events, including access and dietary requirements
- Identification and background information provided by you or collected as part of our business acceptance processes
- Personal information provided to us by or on behalf of our clients or generated by us in the course or providing services to them, which may include special categories of data
- Any other information relating to you which you may provide to us

## How we obtain your personal information

- We collect information from you as part of our business acceptance processes and about you and others as necessary in the course of providing legal services
- We collect your personal information while monitoring our technology tools and services, including our websites and email communications sent to and from Allen & Overy
- We gather information about you when you provide it to us, or interact with us directly, for instance engaging with our staff or registering on one of our digital platforms or applications
- We may collect or receive information about you from other sources, such as keeping the contact details we already hold for you accurate and up to date using publically available sources

## How we use your personal information

Allen & Overy collects and processes personal information about you in a number of ways, including through your use of our website and in the provision of services by us. We use that information:

- To provide and improve this website, including auditing and monitoring its use
- To provide and improve our services to you and to our clients, including handling the personal information of others on behalf of our clients
- To provide information requested by you
- To promote our services, including sending legal updates, publications and details of events
- To manage and administer our relationship with you and our clients
- To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims
- For the purposes of recruitment

- **Use of Allen & Overy website**

A number of facilities on our website invite you to provide us with personal information, such as the vacancy application facility in the 'Careers' section of our website and our email queries facilities. The purpose of these facilities is apparent at the point that you provide your personal information and we only use that information for those purposes.

We use cookies on our website. To learn more about the cookies we use and how to disable them please view our [cookie policy](#).

- **Marketing and other emails**

We use personal information to understand whether you read the emails and other materials, such as legal publications, that we send to you, click on the links to the information that we include in them and whether and how you visit our website after you click on that link (immediately and on future visits). We do this by using software that places a cookie on your device which tracks this activity and records it against your email address. Please see our [cookie policy](#) for more information on cookies and how to manage and remove them. Removal of this cookie will not affect your experience on our websites.

We may also use a relationship management tool, where permitted by applicable local law, to assess the strength of the relationship between individuals in Allen & Overy and our clients or potential clients based on the frequency

of email contact between them. We use that information in order to assess, analyse and improve the services that we provide.

If you receive marketing communications from us and no longer wish to do so, you may unsubscribe at any time by sending an email to [epublications@allenoverly.com].

- **Meetings, Events and Seminars**

We will collect and process personal information about you in relation to your attendance at our offices or at an event or seminar organised by Allen & Overy or its business partners. We will only process and use special categories of personal information about your dietary or access requirements in order to cater for your needs and to meet any other legal or regulatory obligations we may have. We may share your information with IT and other service providers or business partners involved in organising or hosting the relevant event.

- **Legal and other services**

We collect, create, hold and use personal information in the course of and in connection with the services we provide to our clients. We will process identification and background information as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, reputational and financial checks. We will also process personal information provided to us by or on behalf of our clients for the purposes of the work we do for them. The information may be disclosed to third parties to the extent reasonably necessary in connection with that work. Please also see 'Who we share your personal information with' and 'Which countries we transfer your personal information to' below.

## **On what basis we use your personal information**

We use your personal information on the following bases:

- To perform a contract, such as engaging with an individual to provide legal or other services
- For the establishment, exercise or defence of legal claims or proceedings
- To comply with legal and regulatory obligations
- For legitimate business purposes. Please see 'How we use your personal information' for more detail

## **How long we keep your personal information**

Your personal information will be retained in accordance with our global data retention policy which categorises all of the information held by Allen & Overy and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and Allen & Overy's business purposes.

## **Who we share your personal information with**

We are an international law firm and any information that you provide to us may be shared with and processed by any entity in the worldwide network of Allen & Overy and our associated firms. You can see a list of our offices at <http://www.allenoverly.com/locations/>.

We may also share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including:

- Our professional advisers and auditors
- Suppliers to whom we outsource certain support services such as word processing, translation, photocopying and document review
- IT service providers to Allen & Overy
- Third parties engaged in the course of the services we provide to clients and with their prior consent, such as barristers, local counsel and technology service providers like data room and case management services
- Third parties involved in hosting or organising events or seminars

Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new Allen & Overy entities or to third parties through which the business of Allen & Overy will be carried out.

Allen & Overy may use social media sites such as Facebook, LinkedIn and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal information.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

## **How we protect your personal information**

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

Allen & Overy LLP holds the internationally recognised security standard BS ISO/IEC 27001:2013 in respect of its document management and email systems and the supporting infrastructure for Allen & Overy's offices globally. This is an independently verified certification that information security is managed in line with international best practice.

## **Which countries we transfer your personal information to**

In order to provide our services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing this website for the purposes set out in this privacy policy. This may entail a transfer of your information from a location within the European Economic Area (the

“EEA”) to outside the EEA, or from outside the EEA to a location within the EEA. Please see ‘Who we share your personal information with’ for more detail on how the information may be shared with Allen & Overy offices and third party service providers.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. EU standard contractual clauses are in place between all Allen & Overy entities that share and process personal data. Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses.

## **Your rights regarding your personal information**

The European Union’s General Data Protection Regulation and other applicable data protection laws provide certain rights for data subjects.

You are entitled to request details of the information we hold about you and how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict our processing of that information, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to another organisation. You may also have the right to lodge a complaint in relation to Allen & Overy’s processing of your personal information with a local supervisory authority.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see ‘How we use your personal information’) or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by email to [epublications@allenoverly.com].

## **Data controllers**

There are a number of entities through which Allen & Overy provides legal services. Most of the firm’s main IT systems are located in the UK and controlled by Allen & Overy LLP. Depending on the location where legal or other services are provided, another undertaking or entity in the Allen & Overy group may be the data controller in relation to your personal data. Please visit <http://www.allenoverly.com/legal-notices/country-specific/Pages/default.aspx> for details of the Allen & Overy entity through which we practise law in each jurisdiction

and, where necessary having regard to local applicable data protection or privacy laws, a country-specific privacy notice.

## **Further Information**

For further information on our privacy policy or practices or to make a complaint please contact:

Jennifer Brannigan, Global Head of Data Privacy  
Allen & Overy LLP  
68 Donegall Quay  
Belfast  
Northern Ireland  
BT1 3NL

Email: [DataPrivacy@allenoverly.com](mailto:DataPrivacy@allenoverly.com)

Telephone: +44 (0) 28 9060 7500