

Privacy Policy

This policy (together with the terms of use and any other documents referred to in it sets out the basis on which any personal data Spencer West BVI in association with HPA Lawyers Limited (“Spencer West BVI”) collects from you, or that you provide to Spencer West BVI, will be processed by Spencer West BVI. Please read the following carefully to understand Spencer West BVI’s views and practices regarding your personal data and how Spencer West BVI treats it.

Information Spencer West BVI May Collect From You

Spencer West BVI may collect personal data about you, directly (where you are asked to provide the data), indirectly or implicitly when you communicate with Spencer West BVI in person, in writing, by e-mail, by SMS when you use this website or by telephone. Spencer West BVI will, however, only use this personal data in accordance with the purposes set forth in this privacy policy and is committed to protecting and respecting your privacy.

Spencer West BVI may collect and process information that you provide by filling in forms. This includes information provided at the time of subscribing to any newsletter services via this website, e-mail, SMS, telephone or otherwise.

If you communicate with Spencer West BVI, it may keep a record of that correspondence.

Objectives of Processing

Spencer West BVI may use information held about you in the following ways:

- To notify you about changes to Spencer West BVI’s services or products.

- To provide you with information including newsletters about products or services that you request from Spencer West BVI or products or services offered by Spencer West BVI and/or its associates which Spencer West BVI feels may interest you, where you have consented to be contacted for such purposes.

If you are a new client, and where Spencer West BVI permits any of its associates to use your data, Spencer West BVI will contact you by electronic means only if you have consented to this.

By providing your residential address, e-mail address, fax number or telephone number to Spencer West BVI you consent to receiving such communications by such medium.

If there is any change to your personal data which you have submitted to Spencer West BVI, please contact Spencer West BVI at the address given on the Site so that it may ensure its records of your personal data are accurate and, where necessary, kept up to date.

Personal data shall not be retained on record for longer than is necessary for the purpose it is held.

Disclosure

Spencer West BVI may disclose your personal information to third parties if (i) substantially all of Spencer West BVI's assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or (ii) Spencer West BVI is under a duty to disclose or share your personal data in order to comply with any legal obligation (whether in your jurisdiction or elsewhere) or in order to enforce or apply the terms of use and other agreements, or to protect the rights and property of Spencer West BVI and our customers.

Your rights

You have the right to ask Spencer West BVI not to process your personal data for the

purposes listed in the Objectives of Processing section above. You can exercise your right to prevent such processing (i) by contacting Spencer West BVI at the address given below; or (ii) for the purpose of providing newsletters(s) to you either by contacting Spencer West BVI at the address given below or by clicking on the “unsubscribe” option found at the bottom of electronic communications relating to newsletters (e-mail or SMS) sent to you by Spencer West BVI.

Personal and Sensitive Data

Spencer West BVI does not seek to collect sensitive personal data (such as data revealing political opinions, religious beliefs or data concerning health or sex life).

If Spencer West BVI does seek to collect such data, your prior consent will be sought.

Cookies

Spencer West BVI does not place and does not permit any third parties to place cookies which store any personal information on its website’s users equipment.

Restricted Access Passwords

If Spencer West BVI has given you a password which enables you to access certain parts of the site, you are responsible for keeping this password confidential. Spencer West BVI requests that you not to share a password with anyone.

Storage of personal data

The data that Spencer West BVI collects from you may be transferred to, and stored at, a destination inside or outside the European Economic Area (“EEA”). It may also be processed by staff operating inside or outside the EEA who work for Spencer West BVI, one of its associates or for one of its or its associates’ agents. Such staff may be engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Spencer West BVI will

take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although Spencer West BVI will do its best to protect your personal data, Spencer West BVI cannot guarantee the security of your data transmitted to its website; any transmission is at your own risk.

Access to information

Under relevant legislation, you may have the right to access information held about you. Your right of access can be exercised in accordance with the relevant legislation. Any access request may be subject to a fee of up to £10 to meet Spencer West BVI's costs in providing you with details of the information it holds about you.

Amendments

Spencer West BVI reserves the right to modify sections of this privacy policy at any time. Any changes Spencer West BVI may make to its privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

How to Contact Spencer West BVI

If you have any questions about this privacy policy, Spencer West BVI's data processing activities, or you wish to access or update the information held about you, you may contact Spencer West BVI at info@hpabvi.com