

Ronit Talor LLP Privacy Policy

1. Introduction

1.1. Ronit Talor LLP ("we"/"our"/"us"/"the Partnership") (with Partnership number OC427370) is committed to protecting the privacy of our website users and clients. This privacy policy ("**Privacy Policy**") is intended to inform you on how we gather, define, and utilise your Personal Data (as defined in clause 2.1 below).

1.2. All your Personal Data shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**) and all relevant UK national laws implementing GDPR (including the Data Protection Act 2018) and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data (collectively referred to as **Data Protection Legislation**).

1.3. This Privacy Policy applies to all Information collected by us, and provided by you. It is also intended to assist you in making informed decisions when using our website www.ronittalor.com ("**Site**"/"**Website**") and our services. It is important that you read this Privacy Policy together with any other notice or Terms and Conditions of Business that we may provide to you. This Privacy Policy supplements other notices and is not intended to override them. By visiting our Website and affiliated sites you are accepting and consenting to the practices described in this policy.

1.4. The Partnership ensures that it only works with suppliers and third parties who operate in compliance with Data Protection Legislation.

1.5. For any Data Protection or GDPR-related enquiries in connection with our business, please contact us:

By Email: privacy@ronittalor.com

-or-

By mail: Ronit Talor LLP, 85 Great Portland Street, First Floor London W1W 7LT United Kingdom

2. Data Controller

2.1. The Partnership is the controller and responsible for your personally identifiable information ("**Personal Data**") as listed in clause 3 below.

2.2. We have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights as set out in Clause 9 of this

Privacy Policy, please contact the Data Protection Manager using the details set out in clause 1.5 above.

3. Information We Collect From You

3.1. We use automated technologies and interactions to collect data from and about you. With regard to each of your visits to our Site we may automatically collect the following information:

A) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website;

B) Usage Data includes information about how you use our Website and services;

C) Site Specific Information includes information about your visit to our Website including:

i. the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time);

ii. Products, services or other pages you viewed or searched for;

iii. page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

3.2. We collect technical data through analytics providers, advertising networks and search information providers. A list of these third parties can be provided to you on request.

3.3. We will use this information to:

a) administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

b) improve our Site to ensure that content is presented in the most effective manner for you and for your computer;

c) allow you to participate in interactive features of our service, when you choose to do so;

d) to keep our Site safe and secure;

e) measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

f) make suggestions and recommendations to you and other users of our Site about products or services that may interest you or them.

4. Information you give to us:

4.1. You may give us information about you (i.e. Personal Data) by filling in forms on our Site or by corresponding with us by phone, e-mail, mail or otherwise. This includes information you provide to us when you use our Site, use our services and when you report a problem with our Site.

The information you give us may include:

a) Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;

b) Contact Data includes billing address, delivery address, email address and telephone numbers;

c) Financial Data includes bank account and payment card details;

d) Transaction Data includes details about payments to and from you and other details of services you have purchased from us;

e) Profile Data includes orders made by you, your interests, preferences, feedback and survey responses;

f) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

4.2. We will use this information to:

a) carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;

b) to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;

c) to provide you, or permit selected third parties to provide you, with information about services we feel may interest you. If you are an existing client, we may contact you by telephone, mail or electronic means (e-mail or SMS) with information about services similar to those which were the subject of previously. If you are a new client, and where

we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please notify us;

d) to notify you about changes to our service;

e) to ensure that content from our Site is presented in the most effective manner for you and for your computer;

f) to communicate with you about updates to or issues in relation to this Privacy Policy.

5. Information we receive from other sources:

5.1. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case, we will have informed you when we collected that data that it may be shared internally and combined with data collected on this Site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

5.2. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

6. Disclosure of your information

6.1. We may from time to time share your Personal Data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. A list of any other group companies holding your Personal Data can be provided to you on request.

6.2. We may share your information with selected third parties including:

a) Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

b) Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.

c) Analytics and search engine providers that assist us in the improvement and optimization of our Site.

d) Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

e) Professional advisors, such as Solicitors.

6.3. We may disclose your Personal Data to third parties if:

a) we sell or buy any business or assets on your behalf as you may instruct us, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

b) the Partnership or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its clients will be one of the transferred assets.

c) we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions of any of our services and other agreements; or to protect the rights, property or safety of the Partnership, our clients or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. The legal basis for processing your Personal Data

7.1. The Partnership will only process Personal Data where there is a lawful basis as per Data Protection Legislation. This lawful basis shall be one or more of the following:

a) Express consent from you;

b) In order to perform and/or complete a contract with a third party;

c) To comply with a legal obligation;

d) To protect your vital interest;

e) It is in the public interest; and

f) There is a legitimate interest.

7.2. Legitimate interests are a flexible basis upon which the law permits the processing of an individual's Personal Data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of us processing your data. This balancing is performed as objectively as possible by our Data Protection Manager. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (e.g. to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our Terms and Conditions or to this Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (e.g. to keep our records updated and to study how clients use our services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Marketing & Communications (d) Profile (e) Usage	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (e.g. to study how clients use our services, to develop them and grow our business).

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (e.g. for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation.
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Marketing & Communications (d) Profile (e) Usage (f) Technical	Necessary for our legitimate interests (e.g. to study how clients use our services, to develop them, to grow our business and to improve our marketing strategy).
To use data analytics to improve our Website, services, marketing, client relationships and client experience.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business).

8. Where We Store your Personal Data

8.1. The Personal Data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff

working for us or for one of our suppliers who are operating outside the EEA, such as in Israel. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services, such as compliance, IT, legal or management controls. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

8.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8.3. As a result of increased risk posed by cyber fraud please do not send any funds until you have received confirmation from your relevant contact and are certain as to the correct account details. Unfortunately, we do have to warn you that we cannot accept responsibility if you transfer money into an incorrect account.

9. Your Legal Rights

9.1. When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- a)** The right to be informed of how your Personal Data is used (through this notice);
- b)** The right to access any Personal Data held about you;
- c)** The right to withdraw consent at any time, by emailing privacy@ronittalor.com.
- d)** The right to rectify any inaccurate or incomplete Personal Data held about you;
- e)** The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy, or where you have withdrawn consent;
- f)** The right to prevent processing for direct marketing purposes, research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and
- g)** The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

9.2. You can exercise your right to prevent such processing at any time by contacting us at privacy@ronittalor.com.

9.3. Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

10. Data Retention

10.1. The Partnership will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

10.2. The Partnership retains your Personal Data in line with the requirements set out in the Data Protection Legislation and will adjust its Data Retention Policy from time to time in accordance therewith.

10.3. Your right to erasure will be subject to the record-keeping requirements as set out in the Data Protection Legislation. Where we receive a request to delete Personal Data this will be undertaken in line with our usual Data Retention Policy.

11. Cookies

11.1. Similar to other commercial websites, our Website uses a technology called "cookies" and web server logs to collect information about how our Website is used. Cookies are small text files that are placed on your computer's hard drive through your web browser when you visit any website. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

11.2. Like all other users of cookies, we may request the return of information from your computer when your browser requests a webpage from our server. Cookies enable our webserver to identify you to us, and to track your actions and the pages you visit while you use our Website. The cookies we use may last for a single visit to our Site (they are deleted from your computer when you close your browser), or may remain on your computer until you delete them or until a defined period of time has passed.

11.3. Although your browser software enables you to disable cookies, we recommend that you allow the use of cookies in order to take advantage of the features of our Website that rely on their use. If you prevent their use, you will not be able to use all the functionality of our Website. We may use cookies to:

a) record whether you have accepted the use of cookies on our Website. This is solely to comply with the law. If you have chosen not to accept cookies, we will not use cookies for your visit, but unfortunately, our Site will not work well for you.

- b)** allow essential parts of our Website to operate for you.
- c)** operate our content management system.
- d)** enhance security on our contact form. It is set for use only through the contact form. This cookie is deleted when you close your browser.
- e)** collect information about how visitors use our Site. We use the information to improve your experience of our Site and enable us to increase our client base. This cookie collects information in an anonymous form, including the number of visitors to the Site, where visitors have come to the Site from, and the pages they visited.
- f)** record that a user has viewed a webcast. It collects information in an anonymous form. This cookie expires when you close your browser.
- g)** record your activity during a webcast. For example, as to whether you have asked a question or provided an opinion by ticking a box. This information is retained so that we can serve your information to you when you return to the Site. This cookie will record an anonymous ID for each user, but it will not use the information for any other purpose. This cookie will last for a period of time after which it will delete automatically.
- h)** store your Personal Data so that you do not have to provide it afresh when you visit the Site next time. This cookie will last for a period of time after which it will delete automatically.

12. Opt Out

12.1. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time at privacy@ronittalor.com

12.2. Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us.

13. Access to information

13.1. Data Protection Legislation gives you the right to access information held about you. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

14. Changes to our Privacy Policy

14.1. This Privacy Policy was last updated on 21 May 2019.

14.2. Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

15. Your Duty to Provide us With Accurate Data

15.1. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

16. If you fail to provide us with Personal Data

16.1. The information about you that we have collected for the performance of our contracts is required in order for us to successfully fulfil our obligations to you. If you choose not to provide the Personal Data requested, we will not be able to enter into a contract with you to provide the benefits we offer. If we are already processing your Personal Data under a contract, you must end our contractual relationship (as/where permitted) in order to exercise some of your rights.

17. Complaints

17.1. If you are unhappy about our use of your Information, you can contact us at the address or email address detailed in section 1.5 above. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods.

Telephone: 0303 123 11113

Website: <https://ico.org.uk/make-a-complaint/>

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow, Cheshire
SK9 5AF