

## Privacy Statement

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### Introduction

Walkers is an international law firm and professional services business with offices in a number of countries ("**Walkers**"). Walkers is committed to protecting the privacy of people who use our services (including clients and subscribers to online services), job applicants and current employees, alumni, contacts, business partners and visitors to Walkers' website. This Privacy Statement details how Walkers collect, use, disclose, transfer and store your personal information.

This Privacy Statement applies to personal information about you that we collect, use and otherwise process in connection with your relationship with Walkers.

### Controller of personal information

Walkers operates as a global business through a number of separate but related legal entities. Any personal information processed by Walkers in connection with this Privacy Statement is controlled by a "data controller" (as provided for under applicable data protection laws). The data controller for personal information collected through the website and the data controller for personal information collected by each of our offices can be found on our Data Controller page at the end of this Privacy Statement. As set out in this Privacy Statement it may be necessary for, or in the legitimate interests of, Walkers' offices to share your personal data and in such circumstances different Walkers' entities may be joint data controllers of your personal information.

If you have any questions about any aspect of this Privacy Statement please contact us at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com) or see the Data Controller section below for individual office contact information.

Please note that throughout this Privacy Statement the word "website" refers to any web page hosted under the walkersglobal.com domain.

### Collection and use of your personal information

#### 1. IP ADDRESSES AND OTHER TECHNICAL INFORMATION

- 1.1 When you visit our website the server will record your IP address together with the date, time and duration of your visit. An IP address is an assigned number, similar to a telephone number, which allows your computer to communicate over the internet. In addition to your IP address the following technical information will also be collected: your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about your visit including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), pages viewed, download errors, page interaction information (such as scrolling clicks) and methods used to browse away from the website.
- 1.2 Walkers uses this information for its legitimate interests to compile statistical data on the use of our website and to track how users navigate through our website in order to enable us to evaluate and improve it.



## **2. INFORMATION COLLECTED BY USING OUR WEBSITE**

- 2.1 You are not required to provide any personal information to access public areas of Walkers' website.
- 2.2 Personal information such as names, addresses, email addresses, telephone numbers, date of birth and other personal details including details of any assistance you require or otherwise relating to services that we are providing to you will only be collected from users of the website who voluntarily input such information.
- 2.3 If you communicate with Walkers via our [Contact Us](#) form, depending on the nature of your enquiry or request, we may add you to our contact database.

## **3. CONTACT DATABASE**

- 3.1 We may use publically available information about you or information you have provided us with to add to Walkers' contact database. Information that we typically hold in our database includes:
  - (a) your contact information, including your name, job title, organisation's name, address, phone number(s), email address(es) and other identification information;
  - (b) the area(s) of law or business that you practice or have an interest in.
- 3.2 Once your details are included in Walkers' contact database we may also record details of any:
  - (a) Walkers' mailing lists you have subscribed to or unsubscribed from;
  - (b) mailings (including legal advisories and event invitations) we have sent you;
  - (c) hyperlinks you have clicked in any mailing that we have sent you;
  - (d) meetings we have held with you;
  - (e) event invitations you have replied to; and
  - (f) events you have attended.
- 3.3 From time to time we may ask you by email to review your contact details and mailing list preferences, and update them as necessary. This not only helps us to keep the contact information we hold about you up-to-date, it also ensures that we only send you information that you have requested and/or is relevant to you.

## **4. INTERACTIONS WITH WALKERS**

- 4.1 We retain personal information relating to interactions between Walkers and people who use our services (including clients and subscribers to online services), job applicants and current employees, alumni, contacts and business partners, including information relating to the services that we provide. We only retain information that is necessary for the purposes set out in this Privacy Statement.

## 5. USE OF YOUR PERSONAL INFORMATION

- 5.1 Walkers shall only collect and process personal information where it has a legal basis for doing so. This includes where Walkers is fulfilling a contract with you, where Walkers has to comply with a legal duty, where you consent to the collection and use, where Walkers has a legitimate interest in collecting and processing the personal information or where the processing is necessary in the public interest. When personal information is processed, the basis of processing will be in accordance with relevant data privacy laws, our legal obligations and to meet our information security requirements.
- 5.2 Walkers uses personal information which we have collected from you in order to:
- (a) provide you with a more tailored and effective customer service;
  - (b) perform research and analysis aimed at improving our products, services and technologies;
  - (c) communicate with you through certain mandatory service communications such as welcome letters, billing reminders, terms and conditions of engagement;
  - (d) communicate with you in connection with any services that we are providing to you and otherwise perform the services for you that you have engaged us to provide;
  - (e) ensure compliance with regulatory requirements and applicable law;
  - (f) provide subscription content such as legal updates; client advisories and newsletters; invitations to events and seminars; news and updates on partnership promotions; and new office openings;
  - (g) carry out administrative purposes (including within the Walkers group of businesses), which may include for example, accounting and billing, auditing and identification checking;
  - (h) undertake systems testing, maintenance and development and in order to ensure network and information security;
  - (i) prevent fraud; and
  - (j) market our services and products to you where Walkers has a legitimate interest, or you have consented to us doing so and in accordance with your preferences.
- 5.3 Walkers shall only collect, use and otherwise process information revealing racial or ethnic origin, political opinions, religious beliefs or relating to your health or sexual orientation or otherwise which is treated by applicable data protection laws as a "sensitive" or "special" category of personal information, where and only to the extent that you have given your explicit consent unless we are otherwise permitted or required to collect, use and process such information under applicable data protection laws, including but not limited to where this is necessary in connection with contract fulfilment (for example in the course of providing legal advice), legal claims or court proceedings or necessary for reasons of public interest.



- 5.4 Any data collection that is optional will be made clear to you. However Walkers may need to collect and process personal information for certain legal compliance purposes or in order to perform certain services for you, including compliance with legal requirements relating to our anti-fraud, anti-money laundering, know your customer obligations. If you choose not to give us this personal information then it may delay or prevent Walkers from meeting Walkers' obligations or it may mean that Walkers cannot perform certain services for you. Walkers will advise you if this is the case.

## **6. MARKETING**

- 6.1 We may wish to use the personal information that we collect about you, to provide you with relevant marketing communications. This may include sending tailored direct marketing e-mails and other communications relating to our services or those of our partners, conducting statistical and marketing analysis, undertaking marketing research and sending you legal advisories and invitations to seminars and other events.

- 6.2 We shall only send such marketing communications to you to the extent that doing so is in the legitimate business interests of Walkers or where you have consented to us doing so. As set out in the Your Rights section below, you may withdraw that consent at any time by contacting us at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com). In addition each electronic marketing communication that you receive shall have an "unsubscribe" option, which will allow you to stop receiving similar communications in the future.

## **7. CHANGE OF OWNERSHIP**

- 7.1 In the event of a re-organisation, change in ownership, or transfer of all or part of our business, we reserve the right to transfer all of Walkers' data, including personal information, to a new entity or to third parties through which the business of Walkers will be carried out. We will use all reasonable efforts to notify you of such change by posting on [www.walkersglobal.com](http://www.walkersglobal.com) or via an email sent to the email address you provide.

## **8. TRANSFER OF INFORMATION TO WALKERS OFFICES AND THIRD PARTIES**

- 8.1 Walkers shares data between our offices globally, where necessary, for the purposes outlined in this Privacy Statement. Walkers has a data sharing agreement in place between the Walkers legal entities globally that ensures that your personal information is shared in accordance with applicable data protection laws, at all times providing protection to your personal information and your rights.

- 8.2 Walkers has business relationships with third parties. In some instances we may disclose your personal information to third parties where this is necessary to perform the services for which you have engaged Walkers or otherwise in furtherance of an outsourcing or other data processing arrangement. In those circumstances Walkers will ensure that the third party is contractually bound to only process personal information in accordance with applicable data protection laws and with Walkers' specific instructions and requirements, and at all times in a manner that protects your rights under applicable data protection laws. Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function. They will not be permitted to use your information for any purposes other than those outlined in this Privacy Statement.



8.3 In relation to any other third parties, Walkers will only disclose or transfer your information where you have given your consent or where we are required to do so by law or other regulatory code or practice, or where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights.

## 9. TRANSFER OF INFORMATION ABROAD

9.1 As part of the transfers of personal information under Clause 8, personal data may be transferred to or accessed from countries whose laws provide a level of protection for personal data not always equivalent to the level of protection that may be provided in your own country. In particular if you are located inside the European Economic Area ("EEA") your personal information may be transferred to a country outside of the EEA.

9.2 Walkers ensures that cross border transfers comply with all relevant laws and regulations and in addition, we enforce the highest privacy and data management standards across all our offices through Walkers' global Data Protection Policy. A copy of that policy may be obtained by contacting Walkers at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com).

9.3 Unless:

- (a) you have expressly consented to the transfer of personal information;
- (b) the transfer is necessary for the performance of the services for which Walkers has been engaged or the conclusion or performance of a contract concluded in your interests; or
- (c) the transfer is otherwise permitted by applicable data protection laws,

Walkers will only transfer your personal information to a country that is deemed to have an adequate level of protection under the applicable data protection law or otherwise where Walkers has put in place adequate safeguards to protect the personal information. In particular where Walkers sends your personal information outside of the EEA, Walkers shall only do so where the recipient of the information is subject to:

- (a) binding corporate rules;
- (b) standard data protection clauses approved under applicable law;
- (c) an approved code of conduct; or
- (d) an approved certification mechanism.

9.4 Further details on the safeguards adopted by Walkers may be obtained by contacting Walkers at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com).

## 10. RETENTION OF DATA

10.1 Walkers shall only retain your personal information for so long as there is a reasonable need to retain the information for the purposes set out in this Privacy Statement. Further details on Walkers' policy in relation to retention periods can be found in our Record Retention Policy. A copy of that policy may be obtained by contacting Walkers at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com).



## Security

Walkers is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use, or disclosure.

## Links

Walkers' website or marketing email messages sometimes include links to other websites which are not within our control. Once you have left our website or marketing email message, we cannot be held responsible for the content of other websites or the protection and privacy of any information which you provide to those websites. You should exercise caution and look at the privacy statement applicable to the website in question.

## Your rights

You have various rights in respect of the personal information that we collect, use, disclose and transfer concerning you. These rights are set out below. Should you wish to exercise your rights please contact us at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com):

<a href="#">Right of Access</a>	<p>You are entitled to obtain from us details concerning the processing of your personal information. This includes details of the data being processed, the purposes of the processing, any recipients of that information, the period for which the information is processed, the source of the information (if it is not provided by you), any international transfers of the information and the protections we put in place to protect your information. You are also entitled to details of any automated decision making, including profiling, involving your information.</p> <p>You are entitled to a copy of the personal information we process about you (including in electronic form). Additional copies may be subject to a reasonable administrative fee.</p>
<a href="#">Right to Rectification</a>	<p>You are entitled to have any incomplete and inaccurate personal information held by us rectified.</p>
<a href="#">Right to Erasure ("be forgotten")</a>	<p>In certain circumstances you are entitled to have personal information erased, including where this is no longer necessary for the purposes for which it was collected and/or processed; or you withdraw consent to our use of the information.</p> <p>We may continue processing the information in certain circumstances, including: if there are grounds other than consent for processing the information; where processing is in compliance with a legal obligation or for reasons of public interest; or for the exercise or defence of legal claims.</p> <p>If you request that we erase your personal information we shall advise you if we consider that there are on-going grounds permitting us to continue processing your information.</p>
<a href="#">Right to Restrict Processing</a>	<p>You can ask us to restrict the processing of personal information Walkers holds about you if: you contest the accuracy of the personal information we process about you; you consider that the processing is unlawful but</p>

	<p>you do not want us to erase the information; we do not require to continue processing the information but you wish the information to be retained in connection with a legal claim; or you have objected to the grounds upon which we process the information.</p> <p>Where you have asked us to restrict processing the information we shall only hold, process and erase the information as permitted by you or as permitted by applicable data protection laws. We will advise you if we do not agree with your request to restrict processing and our reasons.</p>
Right to Data Portability	Where you provide personal information to us and consent to us using it and the processing is carried out by automatic means you are entitled to receive a copy of that information in a machine-readable format and for that to be provided to another data controller, where technically possible.
Right to Object	<p>You are entitled to object to Walkers collecting, using and otherwise processing your personal information where the basis for the processing is Walkers legitimate interests or the processing is in the public interest. In such circumstances we shall cease processing your personal information unless: we are legitimately processing the information on a different basis; there are compelling legitimate grounds for continuing to process the personal information; or we are otherwise permitted to process the information under applicable data protection laws. If applicable, we will advise you of the basis upon which Walkers continues to process your personal information.</p> <p>If you are not clear of the ground(s) upon which we collect, use and process your personal information you can ask us to confirm this to you, as part of the Right of Access outlined above.</p>
Right to Withdraw Consent	Where you have given us consent to make use of your personal information for any of the purposes outlined in this Privacy Statement you shall be entitled to withdraw that consent. You may do this by emailing us at <a href="mailto:data.privacy@walkersglobal.com">data.privacy@walkersglobal.com</a> .
Right to Complain	<p>In the event that you have any questions, concerns or complaints regarding this Privacy Statement or the manner in which Walkers collects, uses and otherwise processes your personal information we shall always seek to address the same promptly and to your satisfaction. However if you consider that we have not done so you are entitled to lodge a complaint to your local supervisory authority.</p> <p>If you are unclear who the appropriate supervisory authority is for you, please contact us at <a href="mailto:data.privacy@walkersglobal.com">data.privacy@walkersglobal.com</a>.</p>

## Cookies

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent



visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

For information on the cookies used on Walkers' website, please see our Cookie Policy.

## Updates

This Privacy Statement may be updated from time to time and was last updated on 22 February 2019. The current version of this Privacy Statement shall be displayed at [this page](#) on the Walkers website or may otherwise be requested at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com).

If you would like to access previous versions of this policy please contact us at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com).

## Contact information

If you have any questions in relation to this Privacy Statement please contact us at [data.privacy@walkersglobal.com](mailto:data.privacy@walkersglobal.com).

## Data Controllers

Jurisdiction	Data Controller	Address	Phone
Cayman	Walkers (Cayman) LLP	190 Elgin Avenue, George Town, Grand Cayman KY1-9001, Cayman Islands	+1 345 949 0100
	Walkers Compliance and Regulatory Services Limited	190 Elgin Avenue, George Town, Grand Cayman, KY1-9008, Cayman Islands	+1 345 949 0100
	Walkers Corporate Limited	190 Elgin Avenue, George Town, Grand Cayman, KY1-9008, Cayman Islands	+1 345 949 0100
	Walkers Fiduciary Limited	190 Elgin Avenue, George Town, Grand Cayman, KY1-9008, Cayman Islands	+1 345 949 0100
	Walkers Professional Services Limited	190 Elgin Avenue, George Town, Grand Cayman, KY1-9008, Cayman Islands	+1 345 949 0100
British Virgin Islands	Walkers (BVI)	171 Main Street, PO Box 92, Road Town, Tortola, VG1110, British Virgin Islands	+1 284 494 2204
Republic of Ireland	Walkers (Ireland) LLP	5th Floor, The Exchange, George's Doc, IFSC, Dublin 1, Ireland	+353 1 470 6600
	Walkers AV8 Shareholding Services Limited	5th Floor, The Exchange, George's Doc, IFSC, Dublin 1, Ireland	+353 1 470 6600
	Walkers Corporate Services (Ireland) Limited	5th Floor, The Exchange, George's Doc, IFSC, Dublin 1, Ireland	+353 1 470 6600
	Walkers Global Shareholding Services Limited	5th Floor, The Exchange, George's Doc, IFSC, Dublin 1, Ireland	+353 1 470 6600
	Walkers Ireland Shareholding Services Limited	5th Floor, The Exchange, George's Doc, IFSC, Dublin 1, Ireland	+353 1 470 6600
	Walkers Professional	5th Floor, The Exchange, George's Doc, IFSC, Dublin 1, Ireland	+353 1 470 6600

	Services (Ireland) Limited		
UK	Walkers (Europe)	The Scalpel, 11 <sup>th</sup> Floor, 52 Lime Street, London, EC3M 7AF, United Kingdom	+44 (0)20 7220 4999
Jersey	Walkers (Jersey) LLP	PO Box 72, Walker House, 28-34 Hill Street, St. Helier, Jersey, JE4 8PN	+44 (0)1534 700 700
	Walkers Services (Jersey) Limited	PO Box 72, Walker House, 28-34 Hill Street, St. Helier, Jersey, JE4 8PN	+44 (0)1534 700 700
Dubai	Walkers (Dubai) Limited Liability Partnership	PO Box 506513, Level 14, Burj Daman, DIFC, Dubai, United Arab Emirates	+971 4 363 7999
	Walkers Professional Services (Middle East) Limited	PO Box 506513, Level 14, Burj Daman, DIFC, Dubai, United Arab Emirates	+971 4 363 7999
Singapore	Walkers (Singapore) Limited Liability Partnership	3 Church Street, #16-02 Samsung Hub, Singapore, 049483	+65 6595 4670
Hong Kong	Walkers (Hong Kong)	Suite 1501-1507, Alexandra House, 18 Chater Road, Central, Hong Kong	+852 2284 4566
Bermuda	Walkers (Bermuda) Limited	Park Place, 55 Par La Ville Road, Third Floor, Hamilton HM11, Bermuda	+1 441 242 1500
	Walkers Corporate (Bermuda) Limited	Park Place, 55 Par La Ville Road, Third Floor, Hamilton HM11, Bermuda	+1 441 242 1500
Guernsey	Walkers (Guernsey) LLP	12-14 New Street, St Peter Port, Guernsey, GY1 2PF	+44 (0)1481 723723