

PRIVACY NOTICE & COOKIE POLICY

THE FOLLOWING INFORMATION IS PROVIDED TO COMPLY WITH THE REQUIREMENTS OF THE GENERAL DATA PROTECTION REGULATIONS.

Whiteoak Morris Limited is dedicated to ensuring the protection of your personal information. This privacy notice explains how we use any personal information we collect about you, in accordance with the General Data Protection Regulations (“the regulations”). This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

IDENTITY AND CONTACT DETAILS OF THE CONTROLLER AND WHERE APPLICABLE, THE CONTROLLER’S REPRESENTATIVE AND THE DATA PROTECTION OFFICER

Where an insolvency practitioner of Whiteoak Morris Limited is appointed as office holder and the data processing is carried out as part of their statutory duties, the appointed insolvency practitioner is the data controller. For the purpose of the Data Protection Legislation and this notice, we are the ‘data controller’. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice. In either case, the data controller(s) can be contacted at: Whiteoak Morris Limited, Sophia House, 28 Cathedral Road, Cardiff CF11 9LJ, 02920 611047, mail@whiteoakmorris.co.uk.

Where an insolvency practitioner of Whiteoak Morris Limited is not appointed as office holder, or data is collected by the other means, such as via the website, or in anticipation of an insolvency appointment, the data controller is Whiteoak Morris Limited. For contact details, please contact Whiteoak Morris Limited, Sophia House, 28 Cathedral Road, Cardiff CF11 9LJ, 02920 611047, mail@whiteoakmorris.co.uk. Christopher Whiteoak acts as Data Controller for Whiteoak Morris Limited.

HOW WE USE YOUR PERSONAL INFORMATION

The purpose for which personal information is processed may include any or all of the following:

- deliver services and meet legal responsibilities
- verify identity where this is required
- communication by post, email or telephone
- understand needs and how they may be met
- maintain records
- process financial transactions
- prevent and detect crime, fraud or corruption
- may also need to use data to defend or take legal actions related to the above

LAWFUL BASIS FOR THE PROCESSING

To comply with our legal obligations under statute and other regulatory obligations related to the insolvency process. We also believe you have a legitimate interest in the information being supplied.

WHAT PERSONAL INFORMATION WE HOLD

We collect information about you when you ask about the services we can provide. We also collect information if you are connected with any matters that we are dealing with or if you seek employment with us.

The information collected and processed includes but is not limited to the following:

Prospective Clients

Your name, company name, job title, address and contact details, including email address and telephone number, date of birth and gender.

Creditors

Your name, company name, job title, address and contact details, including email address and telephone number, date of birth and gender, employment details if relevant such as wage details etc.

Debtors

Your name, company name, job title, address and contact details, including email address and telephone number, date of birth and gender;

Prospective Employees

Your name, company name, job title, address and contact details, including email address and telephone number, date of birth and gender, the terms and conditions of your employment;

HOW WE USE THE INFORMATION COLLECTED

We collect information about you to answer your questions or deal with your request for advice. In addition, the information is used to manage any matters we may be dealing with which you may be connected to. Information is also processed if you are looking for employment with us. We consider these to be lawful reasons for using the information we collect about you.

In processing your request for advice, we may send and receive information about your personal details from credit reference agencies and fraud prevention agencies.

WHO WE SHARE OUR DATA WITH

Personal data held by us may be transferred to:

Third party organisations that provide applications/functionality, data processing or IT services to us

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The backup, email and website host servers are based in the United States and personal data may be stored in any one of them. The service providers are compliant with the General Data Protection Regulations (GDPR).

Third party organisations that otherwise assist us in providing goods, services or information

Auditors and other professional advisers

Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We retain personal data for as long as is necessary to achieve the purpose listed above and for any other permissible related purpose. For example, we retain most records until the time limit for claims arising from the activities has expired or otherwise to comply with statutory or regulatory requirements regarding the retention of such records.

YOUR RIGHTS

The GDPR provides the following rights for individuals:

Right to inform

This privacy notice meets our requirement to inform you of our processing of your data.

Access to personal data

You have a right of access to personal data held by us as a data controller. This right may be exercised by contacting us at Whiteoak Morris Limited, Sophia House, 28 Cathedral Road, Cardiff CF11 9LJ, on 02920 611047 or at mail@whiteoakmorris.co.uk. We will aim to respond to any requests for information promptly, and in any event within one month.

Amendment of personal data

To update personal data submitted to us, you may email us at mail@whiteoakmorris.co.uk or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which you registered.

Rights that do not apply in these particular circumstances

Not all of the rights under the GDPR are available as one of the reasons we are holding your data is on the basis of it being a legal obligation and therefore the right to erasure, data portability and to object do not apply.

RIGHT TO WITHDRAW CONSENT

Where the data received was not based upon obtaining consent the right to withdraw consent does not apply.

CHANGES TO OUR PRIVACY STATEMENT

We keep this privacy statement under regular review and will place any updates on our website. Paper copies of the privacy statement may also be obtained by writing to us at Whiteoak Morris Limited, Sophia House, 28 Cathedral Road, Cardiff CF11 9LJ. This privacy statement was last updated on 25 May 2018.

COMPLAINTS

Should you want to complain about our use of personal data, please contact us Whiteoak Morris Limited, Sophia House, 28 Cathedral Road, Cardiff CF11 9LJ, on 02920 611047 or by emailing us at mail@whiteoakmorris.co.uk.

You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the [ICO website](https://ico.org.uk), at <https://ico.org.uk>.

WHO PROVIDED THE PERSONAL DATA

The personal data we may use to contact you was provided by the company/individual (or persons acting on their behalf) on whose instructions we are acting or in relation to which our insolvency practitioner has been appointed. We also access information from the Registrar of Companies and other similar public-access data providers.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small sets of data stored in the User's device.

Website Cookies

The Whiteoak Morris Limited website www.whiteoakmorris.co.uk uses cookies, a small piece of data or message which is sent from our web server to your web browser and which is then stored on your hard drive. Cookies can't read data from your hard drive or cookie files created by other websites, nor do they damage your system. The domain www.whiteoakmorris.com automatically redirects to www.whiteoakmorris.co.uk

You can reset your browser to refuse any cookie or to set it to alert you when a cookie is being sent. Web browsers allow you to control cookies stored on your hard drive through the web browser settings. To find out more about cookies, including what cookies have been set and how to manage and delete them, visit <http://www.allaboutcookies.org>. The following types of cookies are used on the www.whiteoakmorris.co.uk website.

Google Analytics

Google Analytics supports three JavaScript libraries (tags) for measuring website usage: gtag.js, analytics.js, and ga.js. The following sections describe how each use cookies.

Cookie Name	Expiration Time	Description
_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named <code>_dc_gtm_<property-id></code> .
AMP_TOKEN	30 seconds to 1 year	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.
gac<property-id>	90 days	Contains campaign related information for the user. Learn more .
__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	10 minutes	Used to throttle request rate.
__utmb	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and

		no existing <code>__utmb</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.
<code>__utmc</code>	End of browser session	Not used in <code>ga.js</code> . Set for interoperability with <code>urchin.js</code> . Historically, this cookie operated in conjunction with the <code>__utmb</code> cookie to determine whether the user was in a new session/visit.
<code>__utmz</code>	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
<code>__utmv</code>	2 years from set/update	Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated <code>_setVar</code> method. The cookie is updated every time data is sent to Google Analytics.

Cloudflare

The `__cfduid` cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis.

For example, if a visitor is in a coffee shop where there may be several infected machines, but the specific visitor's machine is trusted (for example, because they completed a challenge within your Challenge Passage period), the cookie allows Cloudflare to identify that client and not challenge them again. It does not correspond to any user ID in your web application, and does not store any personally identifiable information.

Further information may be found here: <https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-Cloudflare-cfduid-cookie-do->