

## Privacy Notice Regarding the Processing of UK and EU Personal Data About Clients and Other Business Contacts

This Privacy Notice, which is effective as of ~~1 January 2024~~ 24 April 2023, amends the prior version which was effective as of 1 January 2021 ~~28 October 2020~~.

The changes made by this Privacy Notice can be found [here](#).

~~Please read carefully before using this site.~~

**EFFECTIVE DATE:** ~~1 January 2024~~ 24 April 2023

This Privacy Notice sets out the following information:

1. ~~Identification of the~~ [Data Controllers](#);
2. ~~Contact Details of our~~ [Data Protection Officer \("DPO"\)](#);
3. ~~Sources and~~ [Categories and Sources of Personal Data That We Process, Why We Do So, and Lawful Bases for Processing](#);
  - a) [To Provide Legal Services to Our Clients](#)
  - b) [To Comply With Know-Your-Client \("KYC"\) Rules](#)
  - c) [To Perform Credit Checks](#)
  - d) [To Carry Out Conflict-of-Interest Checks](#)
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  - f) [To Market Our Services to Clients and Business Contacts](#)
  - g) [To Facilitate Communications with our Clients, Vendors and Business Contacts](#)
- ~~3.4. Data Sharing – Purposes and Recipient~~ ~~Other Squire Patton Boggs Offices And Operations as Well as Third Parties With Which Our UK and EU Offices May Share Personal Data~~;
- ~~4.5. Circumstances in Which We Transfer Personal Data to Countries Outside the UK and the EU for Processing, and the Safeguards We Put in Place to Protect the Personal Data so Transferred~~ [International Transfers and Safeguards](#);
- ~~5.6. Our Retention Policy for Records Containing Personal Data~~ [Records Retention Policy](#);
- ~~6.7. Individual's Rights in Relation to Their Personal Data~~; and
- ~~7.8. Definitions of Certain Terms Used in This Privacy Notice~~.

## **Introduction**

This Privacy Notice describes the ways in which Squire Patton Boggs, through its United Kingdom and European Union branch offices and legal entities ("our UK and EU Offices") listed in [Annex 1](#), processes and protects the personal data of our clients, individuals related or adverse to our clients and other business contacts in accordance with Applicable Data Protection Laws.

**Move to note [1]:** Squire Patton Boggs is a global law firm operating under a Swiss verein structure that comprises Squire Patton Boggs (UK) LLP, Squire Patton Boggs (US) LLP and other constituent legal entities. A full description of our organisation listing all of our offices worldwide is provided in our [Legal Notices](#) page.

We provide legal services primarily to corporate clients. The types of personal data that we process are those necessary for us to provide our clients with effective legal representation locally, regionally and globally and to carry out various ancillary activities.

As an international law firm, we take very seriously our legal, professional and ethical duties and obligations to protect personal data. We have a robust information security management program in place to protect the personal data and other information that we process, and have achieved ISO27001 certification of the firm's technical and organisational controls across a broad spectrum of systems and processes. These measures are monitored, reviewed and regularly enhanced in order to meet our professional responsibilities and the needs of our clients.

## **1. Data Controllers**

[Squire Patton Boggs \(UK\) LLP or Squire Patton Boggs \(US\) LLP, as applicable.](#)

**Move to note [2]** Our UK and EU Offices are branch offices of, or are otherwise associated with, either Squire Patton Boggs (UK) LLP or Squire Patton Boggs (US) LLP. These are listed in [Annex 1](#) to this Privacy Notice.

If you are a client of one or more of our UK and EU Offices, or an individual related or adverse to one of our clients, the relevant data controller is the Squire Patton Boggs legal entity retained by our client. If

you contract with our UK and EU Offices in any other capacity, your data controller will be the Squire Patton Boggs entity with which you contract.

For cross-border matters, and in relation to personal data shared by several of our UK and EU Offices, the relevant entities may operate as joint controllers that will collaborate with one another, as necessary, to comply with our obligations under Applicable Data Protection Laws, including to address requests by data subjects to exercise their rights, as set out in Section 7. ~~below.~~

The main establishment for our UK and EU Offices for purposes of compliance with the Applicable Data Protection Laws is Squire Patton Boggs (UK) LLP, ~~2 & A Half Devonshire Square, 60 London Wall,~~ London EC2M ~~4UJ~~5TQ, England.

## 2. Data Protection Officer

Move to note [3] The core business of Squire Patton Boggs is the provision of legal services to corporate clients and does not involve the large-scale processing of personal data. Squire Patton Boggs has nonetheless elected to appoint a DPO who acts on behalf of all of our UK and EU Offices in order to support our firmwide data protection compliance efforts.

~~The contact details for our DPO are as follows:~~

~~By e~~Email: [DataProtectionOfficer@squirepb.com](mailto:DataProtectionOfficer@squirepb.com)

~~By p~~Post: \_\_\_\_\_

Data Protection Officer  
Squire Patton Boggs  
~~2 & A Half Devonshire Square~~[60 London Wall](#)  
London EC2M ~~4UJ~~5TQ  
England

Move to note [3] Please direct all general communications or queries relating to this Privacy Notice or the firm's compliance with Applicable Data Protection Laws to our DPO. With regard to the exercise of data subject rights under the Applicable Data Protection Laws, a specific email

address is provided in Section 7 ~~below~~ for the convenience of individuals wishing to submit a data subject request.

### 3. ~~Sources and~~ Categories and Sources of Personal Data That We Process, Why We Do So and Lawful Bases for Processing

Our UK and EU Offices process various categories of personal data for the purposes identified below, ~~on the lawful basis indicated for each respective processing activity.~~

#### a) To Provide Legal Services to Our Clients

i. Provide, charge for and manage the delivery of legal services and communicate with our corporate clients in relation to the same.

[More information \[5\]](#)

<u>Categories of Personal Data</u>	<u>Source</u>	<u>Lawful Basis under the GDPR</u>
<ul style="list-style-type: none"><li><u>Business contact details</u></li><li><u>Bank account details and related personal data</u></li><li><u>Account management information</u></li></ul>	<u>Usually provided to us by our client.</u>	<u>Art. 6(f) - Our legitimate interests as a law firm, and those of our clients, to process personal data relevant to the legal services we provide them.</u>

ii. Provide legal services to our clients where third-party data is necessary and relevant to the legal matter.

[More information \[6\]](#)

<u>Categories of Personal Data</u>	<u>Source</u>	<u>Lawful Basis under the GDPR</u>
<u>Personal data about a client's employees, customers or suppliers or about individuals employed or otherwise associated with an adversary or counterparty.</u>	<u>Our clients, public sources or third parties, depending on the relevant circumstances.</u>	<u>Art. 6(f) - Our legitimate interests as a law firm, and those of our clients, to process personal data relevant to the legal services we provide them.</u>

iii. [Provide legal services to our clients where the processing of special categories of personal data relevant to the legal issues is involved.](#)

[More information \[7\]](#)

<a href="#">Categories of Personal Data</a>	<a href="#">Source</a>	<a href="#">Lawful Basis under the GDPR</a>
<a href="#">Dependent on the nature of the services.</a>	<a href="#">Usually provided to us by our client.</a>	<a href="#">Dependent on the circumstances of each case, processing may be:</a> <ul style="list-style-type: none"> <li>▪ <a href="#">Necessary for the establishment, exercise or defence of legal claims;</a></li> <li>▪ <a href="#">Based on the explicit consent of the individual concerned; or</a></li> <li>• <a href="#">Based on personal data which are manifestly made public by the data subject.</a></li> </ul>

iv. [Provide legal services to our clients that necessitates the processing of information about individuals associated with our clients or adverse parties relating to alleged criminal offenses or convictions.](#)

<a href="#">Categories of Personal Data</a>	<a href="#">Source</a>	<a href="#">Lawful Basis under the GDPR</a>
<a href="#">Information about criminal offenses or convictions</a>	<a href="#">Usually provided to us by our client.</a>	<a href="#">As authorized under applicable national law.</a>

[Move to note \[4\]](#) The information that we collect and process in relation to our clients for the purposes of providing legal services to them is primarily company data and business information.

In some cases, it may be necessary for us to process personal data specific to the matter at hand in order to properly advise and act for our clients. It is not possible to identify every potential category of personal data that we may process as lawyers acting for our clients, since these

are as diverse as the legal issues that we are retained to address. The most typical categories are identified below, along with the relevant sources, purposes and lawful bases for processing.

[Move to note \[5\]](#) In order to provide, charge for and manage the delivery of legal services and communicate with our corporate clients in relation to the same, it is in our legitimate interests as a law firm, and those of our clients, to process personal data relevant to the legal services we provide them. When we are retained by individual clients, we process their data as necessary for us to provide legal services under the terms of our engagement with them and comply with relevant local bar rules.

The categories of personal data that we process for this purpose, which our clients usually provide to us, include the following:

- *Business contact details of clients* (the individual business contact's name, position, company affiliation, physical and email addresses, telephone numbers, etc.) – for purposes of communication in relation to our provision of legal services to them;
- *Bank account details and related personal data necessary for us to make and receive payments* – in order to receive or pay out transaction completion monies or other transaction-related funds such as disbursements, to pay court fees, and to invoice our clients and receive payment; and
- *Account management information* (which may include financial or account performance data related to individuals) – to enable us to assess the provision of our services to clients, for our own internal administrative purposes or at the request of our clients.

[Move to note \[6\]](#) We may also process third-party data as necessary for the provision of legal services to our clients. This information may include personal data about a client's individual employees, customers or suppliers or about individuals employed or otherwise associated with an adversary or counterparty. We may obtain this information from our clients, from public sources or from third parties, depending on the relevant circumstances. For example:

- In corporate or litigation matters, we may need to process the personal data of, or sent to us by, transactional counterparties or opponents in proceedings involving our clients, emails sent to or from employees of our clients or counterparties, and biographical data concerning witnesses and prospective witnesses and legal and other advisers to such third parties.
  - Where it is necessary for our lawyers to review large numbers of documents in relation to litigation matters or investigations, we may use automated systems to help us identify documents of interest, which may contain personal data.
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Move to note [7] In some cases, the client personal data or third-party data that we process in relation to a particular matter may involve the processing of special categories of personal data where relevant to the legal issues involved (for example, in connection with immigration proceedings, data protection, pensions, health and safety regulation or labour and employment matters). The lawful basis upon which we process such data will depend on the circumstances of each case, and may be carried out on the basis that the processing is:

- Necessary for the establishment, exercise of defence of legal claims;
  - Based on the explicit consent of the individual concerned; or
  - Based on personal data which are manifestly made public by the data subject.
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~~We may also process information about individuals associated with our clients or adverse parties relating to alleged criminal offenses or convictions as authorized by applicable law.~~

Move to note [4] Where we obtain personal data from a client in relation to connected individuals or adverse parties, or other third-party data that is subject to the Applicable Data Protection Laws, we do so on the basis that our client has satisfied its own obligations as a controller in its own right in relation to the collection, processing and transfer of such personal data to us.

In many cases, it would be impossible, or would require disproportionate effort on our part, to provide notice of processing directly to these third

parties. In most circumstances, we will in any event be subject to a legal obligation of professional secrecy in relation to client data that are entrusted to us and, therefore, are not permitted to inform the relevant data subjects of our data processing.

**a) b) To Comply With Know-Your-Client ("KYC") Rules**

i. ~~For the purposes of complying~~ Compliance with applicable KYC legislation, including laws on anti-money laundering ("AML"), anti-terrorism, anti-bribery, anti-corruption, contravention of international trade rules and other crimes.

~~we process~~ during our client inception procedures we process:

- Personal data concerning individual clients ~~as necessary to perform the required due diligence~~; and
- Personal data of the officers, shareholders, trustees, beneficial owners, authorised signatories and other individuals associated with our corporate clients

as necessary to perform the required due diligence.

<u>Categories of Personal Data</u>	<u>Sources</u> <u>More information [9]</u>	<u>Lawful Basis under the GDPR</u>
<ul style="list-style-type: none"> <li>• <u>Identification documentation</u></li> <li>• <u>Personal contact details</u></li> <li>• <u>Employment and credit history</u></li> <li>• <u>Other information as necessary to complete required background checks.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>The individuals themselves;</u></li> <li>• <u>The potential client with which they are associated;</u></li> <li>• <u>Third party sources</u></li> </ul>	<u>Art. 6(c) – Legal obligation</u>

ii. Compliance with applicable KYC obligations in jurisdictions outside the UK and the EU, such as checks against the U.S. Office of Foreign Asset Controls Sanctions Lists.

<u>Categories of Personal Data</u>	<u>Sources</u> <u>More information [9]</u>	<u>Lawful Basis under the GDPR</u>
<ul style="list-style-type: none"> <li>• <u>Identification documentation</u></li> <li>• <u>Personal contact details</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>The individuals themselves;</u></li> </ul>	<u>Art. 6(f) - Our legitimate interests as a law firm to</u>



<u>Categories of Personal Data</u>	<u>Sources</u> <u>More information [9]</u>	<u>Lawful Basis under the GDPR</u>
<ul style="list-style-type: none"> <li><u>Employment and credit history</u></li> </ul>	<ul style="list-style-type: none"> <li><u>The potential client with which they are associated;</u></li> <li><u>Third party sources</u></li> </ul>	<u>ensure compliance with our legal and ethical obligations, as necessary to perform these checks.</u>

iii. Where necessary, and as authorized by applicable law, we may also need to collect information pertaining to alleged criminal offenses or convictions of individuals related to the potential client.

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Move to note [8] For these purposes, it may be necessary for us to obtain various types of information from the relevant individuals themselves or the potential client with which they are associated. The information required may include:

- Identification documentation such as passports and national identity cards;
- Personal contact details such as home address and other contact details;
- Employment status and history;
- Credit history; and
- Other information necessary to complete required background checks.

Where necessary, and as authorized by applicable law, we may also need to collect information pertaining to alleged criminal offenses or convictions of individuals related to the potential client. The personal data is used to determine whether we are prohibited by applicable laws from engaging with the client or to identify and evaluate any risks associated with the individual's economic circumstances, reliability or behavior. Depending on the outcome, we may elect, or be required, to decline to enter into a client relationship.

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Move to note [9] To complete the required background checks, we may also rely on third-party sources such as:

- ~~€~~ Credit rating agencies;
- ~~£~~ Identify verification agencies;
- ~~£~~ Publicly accessible sources such as public registers and publicly available internet sites; and
- ~~£~~ Subscription services that provide screening against lists of politically exposed persons and prohibited and/or sanctioned persons identified by the UK or EU governments.

~~Squire Patton Boggs is subject to similar types of KYC obligations in jurisdictions outside the UK and the EU, such as for the purposes of checks against the U.S. Office of Foreign Asset Controls Sanctions Lists. In such cases, it is in the legitimate interests of our law firm to process personal data about individual clients or people associated with our corporate clients as necessary to perform these checks.~~

**c) To Perform Credit Checks**

~~i. For the purposes of~~ Evaluating the creditworthiness of potential clients.

~~During our client inception procedures, we, it is in our legitimate interest to process financial data about our clients, including personal data about associated individuals associated to a potential client, such as (shareholders, non-executive directors, and officers, etc.) in order to evaluate the merits of engaging with them.~~

~~The types of personal data that we process for this purpose may involve bank account details, personal financial information including asset ownership, and credit histories.~~

<u>Categories of Personal Data</u>	<u>Sources</u> <u>More information [10]</u>	<u>Lawful Basis under the GDPR</u>
<ul style="list-style-type: none"><li>• <u>Bank account details</u></li><li>• <u>Personal financial information, such as asset ownership;</u></li><li>• <u>Credit histories</u></li></ul>	<ul style="list-style-type: none"><li>• <u>The individuals themselves;</u></li><li>• <u>Public sources</u></li><li>• <u>Third party sources</u></li></ul>	<u>Art. 6(f) - Our legitimate interests to evaluate the merits of engaging with a potential client.</u>

Move to note [10] This data may be obtained directly from the individuals concerned as well as from public sources and third-party subscription services or credit vetting agencies.

**d) To Carry Out Conflict-Of-Interests Checks**

i. Compliance with legal, regulatory and ethical requirements More information [11]  
OR

ii. Ensure our services are provided free from any conflicts. More information [12]

During our client inception procedures, we may sometimes process personal data about individuals related or adverse to our clients.

In either case, we may not be able to move forward with providing legal services if the personal data are not provided to enable us to complete checks required by law.

<u>Categories of Personal Data</u>	<u>Source</u>	<u>Lawful Basis under the GDPR</u>
<u>Limited personal data to establish whether conflicts are present, such as:</u> <ul style="list-style-type: none"> <li>• <u>Records of litigation:</u></li> <li>• <u>Board memberships:</u></li> <li>• <u>Shareholdings.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>The individuals themselves:</u></li> <li>• <u>Public sources</u></li> <li>• <u>Subscription services such as legal directories</u></li> </ul>	<u>Art. 6(c) – Legal obligation</u>  <u>OR</u>  <u>Art. 6(f) - Our legitimate interests clients to ensure that our services are provided free from any conflicts of interest, where a legal obligation does not apply.</u>

Move to note [11] In most cases, we have a legal obligation to process limited amounts of personal data in order to perform "conflict checks" before incepting clients. Such conflict checks may be required by various laws, regulations and "best practice" ethical guidelines to which Squire

Patton Boggs, as a law firm, is subject. These checks may sometimes involve the processing of personal data about individuals related or adverse to our clients, such as records of litigation in which they are involved, board memberships or shareholdings. We may obtain this information from the individuals concerned, from public sources or from subscription services such as legal directories.

[Move to note \[12\]](#) In circumstances where a legal obligation does not apply, we have a mutual legitimate interest with our clients to ensure that our services are provided free from any conflicts of interest, and rely on our clients to ensure that the individuals involved receive proper notice.

In either case, we may not be able to move forward with providing legal services if the personal data are not provided to enable us to complete checks required by law.

**e) To Engage With Our Vendors**

**i. Communicate and otherwise conduct business with our suppliers.**

[More information \[13\]](#)

<a href="#">Categories of Personal Data</a>	<a href="#">Source</a>	<a href="#">Lawful Basis under the GDPR</a>
<ul style="list-style-type: none"> <li><a href="#">Business contact details</a></li> </ul>	<a href="#">The vendor</a>	<a href="#">Art. 6(f) - Our legitimate interests as a law firm to manage our suppliers.</a>

[Move to note \[13\]](#) For the purposes of dealing with suppliers, it is in our legitimate interests and those of our vendors for us to process the business contact details of the vendors' individual account representatives in order to communicate and otherwise conduct business with them. The information that we typically process for this purpose is provided by the vendor and includes the appointed business contact's:

- [Name](#)
- [Position](#)
- [Company affiliation](#)

- ~~Physical and email addresses.~~
- ~~Telephone numbers.~~

~~We use third party telephone and video conferencing services in order to facilitate communication with our vendors. In some cases, it may be necessary for business or evidentiary reasons for us to record a call. When we do so, we will notify the participants that the call is being recorded. The lawful basis for recording the call may be the consent of the participants or for the purpose of maintaining evidence of a business communication.~~

**~~(f)~~ To Market Our Services to Clients and Business Contacts**

The information contained in this subsection supplements our Global Website Privacy Notice, which may be found here: <https://www.squirepattonboggs.com/en/general-content/global-privacy-policy>. In the event of any inconsistencies between the provisions of our Global Website Privacy Notice and this Privacy Notice, the provisions of this notice shall take precedence in regard to the website and marketing-related processing activities carried out by our UK and EU Offices.

- i. [Provide clients, prospective clients and other business contacts with news, alerts and events opportunities on topics of interest to them.](#)

[More information \[14\]](#)

<a href="#">Categories of Personal Data</a>	<a href="#">Source</a>	<a href="#">Lawful Basis under the GDPR</a>
<ul style="list-style-type: none"> <li>• <a href="#">Business contact details</a></li> <li>• <a href="#">Individuals' subscription preferences</a></li> <li>• <a href="#">Event registration details</a></li> </ul>	<a href="#">Directly from the individual with whom we communicate or who registers to attend our events.</a>	<a href="#">Art. 6(1)(f) - Our legitimate interests as a law firm to keep our clients and contacts informed on relevant legal topics.</a>  <a href="#">OR</a>  <a href="#">Art. 6(1)(a) – Consent, where we do not have an existing business</a>

		<a href="#">relationship with a prospective client.</a>
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ii. [Record information about our business development and marketing activities, such as meetings and other interactions with clients and prospective clients.](#)

[More information \[15\]](#)

<a href="#">Categories of Personal Data</a>	<a href="#">Source</a>	<a href="#">Lawful Basis under the GDPR</a>
<ul style="list-style-type: none"> <li><a href="#">Notes of business interactions</a></li> </ul>	<a href="#">Firm personnel interacting with the individual.</a>	<a href="#">Art. 6(f) - Our legitimate interests as a law firm to keep to keep records of our business development activities.</a>

[Move to note \[14\]](#) It is in our legitimate interest as a law firm to collect and process business contact data needed to provide requesting clients and contacts with copies of our newsletters on legal developments covering different practice areas, client alerts, blogs, invitations to seminars, online webinars and similar events that we offer and other marketing materials, where we believe this may be of interest. ~~We also collect business contact data to record information about our business development and marketing activities, such as meetings and other interactions with clients and prospective clients. In addition, we organize and facilitate communications amongst alumni of the Firm.~~

The personal data that we collect for these purposes includes the following:

- ~~The [b](#)Business contact details, [such as](#) of our individual clients and the employees of our corporate clients (e.g., name, address, email address, phone number, company name, company address, title or position);~~

- ~~• The business contact details of prospective clients, consultants and other parties that may be interested in using our services or partnering with us; and~~
- Individuals' subscription preferences. Where relevant, information provided by these individuals about their preferences in relation to receiving updates from us on developments in particular practice areas and industry sectors, firm-sponsored events and the like.
- ~~• The date and time of business interactions, notes of the meetings or events.~~ Event registration details, such as
- ~~Where we are delivering webinars using an online conferencing service, the details for registration of your attendance (e.g. name, company name, title or position, and email address).~~

We generally obtain the business contact details and preference information that we use for marketing communications and business development activities directly from our clients or prospects. This includes visitors to our website, who may register online to opt-in to receiving client alerts, newsletters, invitations to events and other information from us.

We may also obtain your business contact details and information about your preferences in regard to the subject matter of newsletters and other materials or events that we offer when you provide us with your business card at conferences that we sponsor or network with our lawyers and staff at meetings or events.

We obtain the consent of prospective clients and others with whom we do not have an existing client relationship before sending them our marketing materials by electronic means, where required by applicable electronic marketing communications rules. We have in place an effective online tool for users to manage requests to opt out or modify their preferences in relation to the subject matter and categories of information they receive.

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[Move to note \[15\]](#) We also collect business contact data to record information about our business development and marketing activities, such as meetings and other interactions with clients and prospective

clients. In addition, we organize and facilitate communications amongst alumni of the Firm. The personal data that we collect for these purposes includes the date and time of business interactions and notes of the meetings or events.

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Move to note [25] In order to manage the preferences of our clients, website visitors and other business contacts efficiently and maintain the accuracy of the data we collect, we utilize third-party marketing and events management platforms and other solutions. ~~We safeguard any personal data that we transfer to these service providers, or which they collect on our behalf, in the manner discussed in Sections 4 and 5 below. The personal data that you provide us when you register on our website may be shared with Squire Patton Boggs marketing personnel or lawyers located in offices outside the UK and EU. Intra-group transfers of personal data within Squire Patton Boggs are safeguarded by the EU Standard Contractual Clauses, as discussed in Section 5 below.~~

iii. Evaluate usage and improve visitors' experience on our website.

We use “cookies” and similar applications for the purposes of enabling us to evaluate the use of our website and improve the experience of visitors to it. For information on the way in which we use cookies to monitor and manage our website performance, please see our Cookie Notice.

g) To Facilitate Communications With Our Clients and Other Business Contacts

i. We use audio and video conferencing services provided by third parties for the purposes of providing legal advice, training, client service and to deliver webinars.



<u>Categories of Personal Data</u>	<u>Source</u>	<u>Lawful Basis under the GDPR</u>
<ul style="list-style-type: none"> <li><u>Audio/video recordings</u></li> </ul>	<u>Directly from the individuals participating in the audio/video conference</u>	<u>Art. 6(a) – Consent, subject to notification prior to recording;</u>  <u>OR</u>  <u>Art 6(f) -- Our legitimate interests to maintain evidence of a business communication.</u>

Move to note [16] We use ~~telephone audio~~ and video conferencing services provided by third parties for the purposes of providing legal advice, training, client service and to deliver webinars. In some cases, we may record a call for evidentiary purposes or memorialise a webinar for further training use. In such cases, we will notify the participants that the call is being recorded. Depending on the circumstances, the lawful basis for recording the call will be either the participants' consent or to provide evidence of a business communication.

#### **4. Data Sharing ~~Within Squire Patton Boggs and With Third Parties~~ – Purposes and Recipients**

The purposes for which we share personal data relating to our clients and business contacts among our UK, EU and global offices, and also with trusted third-party vendors and business partners, are set out below.

##### **a) *Intra-group transfers***

Lawyers and staff in our UK and EU Offices work collaboratively with colleagues in Squire Patton Boggs offices around the globe on cross-border matters, marketing and business development activities and to share experience, knowledge and resources.

<u><a href="#">Purpose of the Transfers</a></u>	<u><a href="#">Recipients</a></u>
<u><a href="#">i. To deliver legal services to our clients, for example when a particular matter involves legal issues in multiple jurisdictions.</a></u>	<a href="#">More information [17]</a> <a href="#">Squire Patton Boggs offices worldwide</a>
<u><a href="#">ii. Financial management, client billing, firm management and administration.</a></u>	<a href="#">More information [18]</a> <a href="#">Squire Patton Boggs offices worldwide</a>
<u><a href="#">iii. Marketing communications and business development activities.</a></u>	<a href="#">More information [19]</a> <a href="#">Squire Patton Boggs offices worldwide</a>
<u><a href="#">iv. Use of e-discovery software or virtual data rooms hosted on the Firm's United States servers, subject to the client's prior authorization;</a></u>	<a href="#">More information [20]</a> <a href="#">Squire Patton Boggs offices worldwide</a>
<u><a href="#">v. For security purposes, including backup/failover and business continuity.</a></u>	<a href="#">More information [21]</a> <a href="#">Squire Patton Boggs offices worldwide</a>

[Move to note \[17\]](#) Transfers of personal data between and among our UK and EU Offices (see [Annex 1](#)), as well as with lawyers in other offices of the firm, may be necessary in order to deliver legal services to our clients efficiently and effectively or at the request of our clients. For example, a particular matter may involve legal issues or proceedings in multiple jurisdictions, and in these cases we may share personal data relating to the matter amongst selected Squire Patton Boggs colleagues based in our offices around the world, unless we are instructed otherwise by our client in relation to a particular matter. These cross-border transfers within the firm are governed by intra-group controller arrangements and processor agreements, as appropriate.

[Move to note \[18\]](#) Other firm functions that involve the transfer of client-related and business contact personal data to selected members of management and staff located in our offices within and outside the UK and the EU include financial management, client billing, firm management and administration.

[Move to note \[19\]](#) Marketing data containing UK and EU business contact details and client preferences in regard to legal developments in specific practice areas, client alerts, newsletters and events are accessible by selected members of the Squire Patton Boggs marketing team and may be shared with lawyers working in offices outside the UK and the EU. Client-related and business contact information collected in the course of networking and business development activities may be shared among lawyers and staff in our UK and EU Offices and collaboratively with colleagues in Squire Patton Boggs offices around the globe.

[Move to note \[20\]](#) Subject to the client's prior authorization, our contentious practice sometimes relies on e-discovery software that is operated by an expert team with the firm that is based in the United States and virtual data rooms that are hosted on the firm's United States servers.

[Move to note \[21\]](#) For security purposes (in particular back-up and failover), all client data, which may include personal data, within the UK and the EU are stored on servers based in the UK and mirrored on Squire Patton Boggs servers located in the United States, where certain firmwide applications are hosted.

~~Contractual arrangements governing international transfers of personal data from the UK and EU to Squire Patton Boggs offices outside the UK and EU are discussed in Section 5 below.~~

#### **b) Transfers to Unaffiliated Third Parties**

Our UK and EU Offices also share personal data with trusted ~~service providers~~ [suppliers](#) and business partners pursuant to our contractual arrangements. ~~with them~~

<u><a href="#">Purpose of the Transfers</a></u>	<u><a href="#">Recipients (examples)</a></u>
<u><a href="#">i. To deliver legal services to our clients</a></u>	<u><a href="#">Third-party consultants or experts, local counsel, barristers, opposing counsel, matter management platform services providers.</a></u>
<u><a href="#">ii. To comply with legal obligations</a></u>	<u><a href="#">Courts, tribunals, regulatory authorities, tax authorities and law enforcement.</a></u> <u><a href="#">More information [23]</a></u>
<u><a href="#">iii. Firm operations and management</a></u>	<u><a href="#">IT service providers, telecommunications operators, banking institutions, auditors, and professional indemnity insurers together with their appointed legal and other advisors.</a></u>
<u><a href="#">iv. Business intake and KYC checks</a></u>	<u><a href="#">Credit vetting agencies, background check firms, legal directories.</a></u>
<u><a href="#">v. Financial management, client billing</a></u>	<u><a href="#">E-billing platform service providers.</a></u>
<u><a href="#">vi. Assess creditworthiness, check your identity, manage your account, trace and recover debts and prevent criminal activity;</a></u>	<u><a href="#">Experian</a></u> <u><a href="#">More information [24]</a></u>
<u><a href="#">vii. Marketing communications and business development activities;</a></u>	<u><a href="#">Marketing and events management platforms</a></u> <u><a href="#">More information [25]</a></u>
<u><a href="#">viii. Provision of e-discovery services and virtual data rooms.</a></u>	<u><a href="#">Data room administrators, document review service providers</a></u>
<u><a href="#">ix. For business continuity purposes.</a></u>	<u><a href="#">Tertiary email backup provider.</a></u>

<u><a href="#">Purpose of the Transfers</a></u>	<u><a href="#">Recipients (examples)</a></u>
x. <u><a href="#">For business expansion</a></u>	<u><a href="#">Potential merger partners</a></u> <u><a href="#">More information [26]</a></u>

~~, which will include appropriate safeguards to protect any personal data that we share with them.~~ [Move to note \[22\]](#) The data

recipients include, for example, IT service providers, marketing and events management platforms, telecommunications operators, banking institutions, data room administrators, document review service providers, credit vetting agencies, background check firms, legal directories, third-party consultants or experts, local counsel, barristers, opposing counsel, auditors, and professional indemnity insurers together with their appointed legal and other advisors. If requested by our clients, this may also include e-billing and matter management platform services providers.

[Move to note \[23\]](#) We may also share personal data collected for the purposes of client retainers with external recipients in circumstances where we have a legal obligation to do so, including but not limited to courts, tribunals, regulatory authorities, tax authorities and law enforcement.

[Note \[24\]](#) [We provide information, which may include personal information to Experian, a credit reference agency \(CRA\) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with Experian on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and](#)

[share personal information, are explained in more detail at http://www.experian.co.uk/crain/index.html.](http://www.experian.co.uk/crain/index.html)

**Move to note [26]** ~~Finally, it~~ may be necessary for our UK and EU Offices from time to time to share client data with potential merger partners located in countries outside the UK and EU in cases where negotiations have reached a reasonably advanced stage. Any personal data that may be transferred to a potential merger partner will be limited to that which is necessary for the transaction to proceed, and will be safeguarded by protective contractual measures, including the EU Standard Contractual Clauses where required.

~~Contractual arrangements governing other international transfers of personal data to third party suppliers and partners outside the UK and EU are discussed in Section 5 below.~~

We will never sell personal data collected for the purposes of client retainers, or otherwise obtained from third parties, nor knowingly permit it to be used for marketing purposes by any person outside Squire Patton Boggs.

## **5. International Transfers and Safeguards**

We transfer personal data intra-group and externally to third countries outside the UK and EU that are not considered to provide an adequate level of data protection. You may request a copy of the EU Standard Contractual Clauses or other relevant international transfer documentation by contacting the DPO using the contact details provided in Section 2 above.

<u><a href="#">Type of International Transfer</a></u>	<u><a href="#">Contractual Safeguards</a></u>
<u><a href="#">a) Intra-group transfers from our UK and EU Offices to Squire Patton Boggs offices in the United States, Australia, the Asia-Pacific region, the Middle East and other locations outside the UK and EU</a></u>	<u><a href="#">Intra-group data transfer agreement incorporating EU Commission-approved Standard Contractual Clauses (2021/914) and the UK International Data</a></u>

<u>Type of International Transfer</u>	<u>Contractual Safeguards</u>
	<u>Transfer Addendum, as applicable.</u>
<u>b) Transfers to Unaffiliated Third Parties</u>	<a href="#">More information [27]</a> <ul style="list-style-type: none"> <li>• <u>Data transfer agreements based on the applicable EU Commission-approved Standard Contractual Clauses or UK International Data Transfer Addendum, as applicable; or</u></li> <li>• <u>Other available data transfer mechanisms (Binding Corporate Rules, approved Certifications or Codes of Conduct); or</u></li> <li>• <u>In exceptional cases, we may rely on statutory derogations for international data transfers.</u></li> </ul>

~~**Intra-group Transfers**~~

~~We have put in place appropriate intra-group agreements using the EU Commission-approved Standard Contractual Clauses for controllers or processors, as appropriate, to protect intra-group transfers of personal data from our UK and EU Offices to Squire Patton Boggs offices in the United States, Australia, the Asia-Pacific region, the Middle East and other locations outside the UK and EU.~~

~~**Transfers to Unaffiliated Third Parties**~~

Move to note [27] Courts, tribunals, government authorities and related parties or counterparties with whom we share personal data, the third-party vendors identified in Section 4 and business partners are in some cases located outside the UK and the EU. Unless the recipients are located in countries that have been deemed adequate by the European Commission, we put in place data transfer agreements based on the applicable European

Commission-approved Standard Contractual Clauses or rely on other available data transfer mechanisms (Binding Corporate Rules, approved Certifications or Codes of Conduct) to protect the personal data so transferred. In exceptional cases, we may rely on statutory derogations for international data transfers.

## 6. Records Retention Policy

Our UK and EU Offices (and other Squire Patton Boggs offices that are recipients of personal data received from them) retain personal data only for as long as necessary for the purposes for which the data was collected, except where necessary to meet our legal obligations (for example, in relation to AML requirements) or in order to establish, exercise or defend potential legal claims or to pursue our legitimate interests.

## 7. Rights of Individuals in Relation to Their Personal Data

The Applicable Data Protection Law provides certain rights to data subjects in relation to their personal data. These include the rights to:

<a href="#">Access</a>	<a href="#">Request details about and a copy of the personal data we hold about them.</a>	<a href="#">More information [28]</a>
<a href="#">Rectification</a>	<del>Correct or update their personal data subject to the above:</del>	<a href="#">More information [29]</a>
<a href="#">Portability</a>	<a href="#">Port personal data that the data subject has provided to us, in machine readable format</a>	<a href="#">More information [30]</a>
<a href="#">Erasure</a>	<a href="#">Erase the data that we hold about them</a>	<a href="#">More information [31]</a>
<a href="#">Restriction</a>	<a href="#">Restrict processing in some cases</a>	<a href="#">More information [32]</a>



<a href="#">Objection</a>	<a href="#">Object to processing in some cases.</a>	<a href="#">More information [33]</a>
<a href="#">Consent</a>	<a href="#">Decline to consent or withdraw consent.</a>	<a href="#">More information [34]</a>

~~[Move to note \[28\]](#) Request details about the personal data that we process, and obtain a copy of the data that we hold about them.~~ [The right of access applies only](#) (to the extent this is not in breach of a legal obligation of professional secrecy to which we are subject in relation to client data entrusted to us and that would, therefore, prevent us from informing the relevant data subjects).

[Note \[29\]](#) [The right to rectification applies only to the extent this is not in breach of a legal obligation of professional secrecy to which we are subject in relation to client data entrusted to us.](#)

[Note \[30\]](#) [Port personal data that the data subject has provided to us, in machine readable format, to another supplier.](#)

[Note \[31\]](#) [The right to erasure applies in some cases and only to the extent this is not in breach of a legal obligation of professional secrecy to which we are subject in relation to client data entrusted to us.](#)

[Note \[32\]](#) [The right to restriction or objection applies in some cases, and only to the extent this is not in breach of a legal obligation of professional secrecy to which we are subject in relation to client data entrusted to us.](#)

- ~~• [Correct or update their personal data subject to the above;](#)~~
- ~~• [Port personal data that the data subject has provided to us, in machine readable format, to another supplier;](#)~~
- ~~• [Erase the data that we hold about them in some cases;](#)~~
- ~~• [Restrict or object to its processing in some cases; and](#)~~
- ~~• [Object to processing;](#)~~

[Move to note \[33\]](#) [The right to object may be exercised;](#)

- Based on grounds relating to the individual's particular situation, where the processing is based on the legitimate interest of Squire Patton Boggs or our clients; or
- Where personal data is being processed for direct marketing purposes.

[Move to note \[34\]](#) Where consent is the basis for processing their personal data, the individual may decline to give his or her consent, or to withdraw consent to the processing at any time.

These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which we are subject in the performance of legal services.

In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 3 of this Privacy Notice and provide effective legal services.

[Move to note \[35\]](#) The processing of requests for action by Squire Patton Boggs in regard to the exercise of a data subject's rights under the Applicable Data Protection Law is overseen by an internal team consisting of the DSAR Manager, the Office of General Counsel, the DPO and other professionals as needed to respond to the particular request.

Any individual wishing to assert his or her rights under the Applicable Data Protection Laws should address the relevant request to:

By post: \_\_\_\_\_

DSAR Manager  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Squire Patton Boggs (UK) LLP  
Room 4.65  
6 Wellington Place  
Leeds LS1 4AP  
England

By email: [DataSubjectRequests@squirepb.com](mailto:DataSubjectRequests@squirepb.com)

Further information and a form that can be used by a data subject at his discretion to exercise these rights may be downloaded [here](#).

Data subjects also have the right to submit a complaint concerning our processing of their personal data to the appropriate supervisory authority.

## **8. Definitions**

"Applicable Data Protection Law" means the [EU](#) GDPR, the UK GDPR, the UK Data Protection Act 2018 and any national laws governing the protection of personal data as may be amended from time to time.

"Client" means an individual or legal entity that is or was a client of Squire Patton Boggs pursuant to an existing or past retainer, or that makes or made contact with or has or had discussions with Squire Patton Boggs with a view to such a retainer being established (whether or not such a retainer was or is subsequently established).

"Controller" means an individual or entity who or which, alone or jointly, determines the purposes and means of processing of personal data (and, where relevant, this term shall have the specific meaning attributable to it for the purposes of the Applicable Data Protection Law).

"DSAR" means Data Subject Action Request, relating to the rights of data subjects under the Applicable Data Protection Law.

"EU" means the European Union or, where relevant in the given context, the European Economic Area.

"[EU](#) GDPR" means the General Data Protection Regulation, (EU) 2016/679, and applicable national implementing legislation.

["GDPR" means the EU GDPR and/or the UK GDPR, as applicable.](#)

"Individual" means a human person (also sometimes referred to as a "natural" person).

"Legal Notices" means the [Legal Notices](#) page on the Squire Patton Boggs website which hosts this Privacy Notice.

"Personal data" means any information relating to an identified or identifiable individual (a "data subject"). An identifiable individual is one whose identity can be established by one or more identifiers (for example, their name) specific to that individual.

"Processing" means any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Processor" means an individual or entity who or which processes personal data on behalf of a controller.

"Recipient" means an individual or entity to whom or to which personal data are transmitted or disclosed.

"Retainer" means a contract, established under the laws and regulations of the relevant jurisdiction, for the provision of legal services by Squire Patton Boggs to a client.

"Third party" when used to describe a data subject, means an individual who is not a client.

"Third-party data" means personal data of a third party.

["UK" means the United Kingdom of Great Britain and Northern Ireland.](#)

"UK GDPR" means UK legislation incorporating the provisions of the [EU](#) GDPR into the body of UK law [by virtue of section 3 of the European Union \(Withdrawal\) Act 2018.](#)

### **MORE INFORMATION**

**// INSERT ALL NOTES FROM MAIN BODY HERE //**

## **ANNEX 1**

**Squire Patton Boggs branch offices and legal entities in the United Kingdom and the European Union**

**Squire Patton Boggs (UK) LLP**

~~2 & A Half Devonshire Square~~

[60 London Wall](#)

London EC2M [5TQ4UJ](#)

England

+44 20 7655 1000

<del>UK Branch offices of Squire Patton Boggs (UK) LLP</del>	
Squire Patton Boggs (UK) LLP Rutland House 148 Edmund Street Birmingham B3 2JR England +44 121 222 3000	Squire Patton Boggs (UK) LLP 6 Wellington Place Leeds LS1 4AP England +44 113 284 7000
Squire Patton Boggs (UK) LLP No. 1 Spinningfields 1 Hardman Square Manchester M3 3EB England +44 161 830 5000	Squire Patton Boggs (UK) LLP Avenue <del>Lloyd George, 7</del> <a href="#">Louise 523</a> 10050 Brussels Belgium +322 627 11 11
Squire Patton Boggs (UK) LLP Plaza Marques de Salamanca 3-4, 7th Floor 28006 Madrid Spain +34 91 426 4840	Squire Patton Boggs (UK) LLP Via San Raffaele 1 20121 - Milan Italy +39 02 12 412 7700

~~EU Branch offices of Squire Patton Boggs (UK) LLP~~

**Squire Patton Boggs (US) LLP**

~~2 & A Half Devonshire Square~~ [60 London Wall](#)

London EC2M [5TQ4UJ](#)

England

+44 20 7655 1000

<b><del>EU</del> Branch offices of Squire Patton Boggs (US) LLP</b>	
Squire Patton Boggs (US) LLP Rechtsanwälte, Steuerberater und Attorneys-at-Law Unter den Linden 14 10117 Berlin Germany +49 30 7261 68 000	Squire Patton Boggs (US) LLP Rechtsanwälte, Steuerberater und Attorneys-at-Law Herrenberger Straße 12 71032 Böblingen Germany +49 7031 439 9600
Squire Patton Boggs (US) LLP Avenue <del>Lloyd George, 7</del> <a href="#">Louise 523</a> 10500 Brussels Belgium +322 627 11 11	Squire Patton Boggs (US) LLP Rechtsanwälte, Steuerberater und Attorneys-at-Law Eurotheum, Neue Mainzer Straße 66-68 60311 Frankfurt am Main Germany +49 69 1739 2400

<b>Other constituent legal entities <del>in the UK</del></b>	
Advokátska kancelária Squire Patton Boggs s.r.o. Zochova 5 811 03 Bratislava Slovak Republic +421 2 5930 3411	Squire Patton Boggs s.r.o., advokátní kancelář Václavské náměstí 813/57 110 00 Prague 1 Czech Republic +420 221 662 111
Hausmann Associés SELARL trading under the name Squire Patton Boggs 7, rue du Général Foy 75008 Paris France +33 1 5383 7400	Squire Patton Boggs Krześniak sp.k. Rondo ONZ 1 00-124 Warsaw Poland +48 22 395 5500

<p>Squire Patton Boggs Park Lane Limited  Rutland House  148 Edmund Street  Birmingham B3 2JR  England  +44 121 222 3000</p>	<p>Trinity Park Trustees Limited  Rutland House  148 Edmund Street  Birmingham B3 2JR  England  +44 121 222 3000</p>
<p>Devonshire Trustees Limited  Rutland House  148 Edmund Street  Birmingham B3 2JR  England  +44 121 222 3000</p>	<p>Farrington Management Company  Rutland House  148 Edmund Street  Birmingham B3 2JR  England  +44 121 222 3000</p>
<p>Squire Patton Boggs Secretarial Services Limited  Rutland House  148 Edmund Street  Birmingham B3 2JR  England  +44 121 222 3000</p>	<p>The Trustee Corporation Limited  Rutland House  148 Edmund Street  Birmingham B3 2JR  England  +44 121 222 3000</p>
<p>Hammond Suddards Trustees Limited  6 Wellington Place  Leeds LS1 4AP  England  +44 113 284 7000</p>	<p>Devonshire Promotions Limited  <del>2 &amp; A Half Devonshire Square</del> <a href="#">60 London Wall</a>  London EC2M <del>4UJ</del> <a href="#">5TQ</a>  England  +44 20 7655 1000</p>
<p>SHE Consultants Limited  <del>2 &amp; A Half Devonshire Square</del> <a href="#">60 London Wall</a>  London EC2M <del>4UJ</del> <a href="#">5TQ</a>  England  +44 20 7655 1000</p>	<p>Squire Patton Boggs Directors Limited  <del>2 &amp; A Half Devonshire Square</del> <a href="#">60 London Wall</a>  London EC2M <del>4UJ</del> <a href="#">5TQ</a>  England  +44 20 7655 1000</p>
<p>Squire Patton Boggs Secretaries Limited  <del>2 &amp; A Half Devonshire Square</del> <a href="#">60 London Wall</a>  London EC2M <del>4UJ</del> <a href="#">5TQ</a>  England  +44 20 7655 1000</p>	

