

WEBSITE PRIVACY POLICY

Definitions and interpretation

1. In this privacy policy, the following definitions are used:
 - **Data:** collectively all information that you submit to Higgs & Johnson via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998;
 - **Cookies:** a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in 24 - 30 below;
 - **Higgs & Johnson , or us:** Higgs & Johnson, a place of business headquartered in The Bahamas, whose registered office is at Ocean Centre, Montagu Foreshore, East Bay Street, P. O. Box N 3247, Nassau, Bahamas;
 - **UK and EU Cookie Law:** the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
 - **User or you:** any third party that accesses the Website and is not either (i) employed by Higgs & Johnson and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Higgs & Johnson and accessing the Website in connection with the provision of such services; and
 - **Website:** the website that you are currently using, <https://higgsjohnson.com>; any subdomains of this site are accessed according to their own terms and conditions.
2. In this privacy policy, unless the context requires a different interpretation:
 - a. the singular includes the plural and vice versa;
 - b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
 - c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
 - d. "including" is understood to mean "including without limitation";
 - e. reference to any statutory provision includes any modification or amendment of it;
 - f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

3. This privacy policy applies only to the actions of Higgs & Johnson and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

Data collected

4. We may collect the following Data, which includes personal Data, from you:
Contact Information such as email addresses and telephone numbers;

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- a. Name (user submitted);
- b. E-mail address (user submitted);
- c. Enquiry (user submitted);
- d. IP address (automatically collected);
- e. Geo-location (derived from the IP address);
- f. Web browser type and version (automatically collected);
- g. The presence, or use of 'apps', screen resolution or preferred language
- h. The date and time of your website visit
- i. Operating system (automatically collected);
- j. A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);
- k. Selections made using our barrister portfolio system;

Our use of Data

5. For purposes of the Data Protection Act 1998, Higgs & Johnson is the "data controller".
6. Data is retained for 13 months.
7. Unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This includes our affiliates and / or other companies within our group.
8. All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see 21 - 23 below.
9. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 - a. internal record keeping;
 - b. improvement of our products / services;
 - c. transmission by email of promotional materials that may be of interest to you;
 - d. contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website; in each case, in accordance with this privacy policy.

Third party websites and services

10. Higgs & Johnson may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services may have access to certain personal Data provided by Users of this Website.

Links to other websites

11. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does

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not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

12. Higgs & Johnson may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Higgs & Johnson. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
13. We may also disclose Data to a prospective purchaser of our business or any part of it.
14. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Controlling use of your Data

15. Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:
 16. use of Data for direct marketing purposes; and
 17. sharing Data with third parties.

Functionality of the Website

18. To use all features and functions available on the Website, you may be required to submit certain Data.
19. You may restrict your internet browser's use of Cookies. For more information see 24 - 30 below.

Accessing your own Data

20. You have the right to ask for a copy of any of your personal Data held by Higgs & Johnson (where such Data is held) on payment of a small fee, which will not exceed the equivalency of £10.

Security

21. Data security is of great importance to Higgs & Johnson and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.
22. If password access is required for certain parts of the Website, you are responsible for keeping this password confidential.

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23. We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the Website.

Cookies

24. This Website may place and access certain Cookies on your computer. Higgs & Johnson uses Cookies to improve your experience of using the Website and to improve our range of services. Higgs & Johnson has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
25. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
26. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Higgs & Johnson to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function, or function as intended.
27. This Website may place the following Cookies:
- AddThis – <https://www.oracle.com/legal/privacy/addthis-privacy-policy.html>
 - ShareThis – <https://www.sharethis.com/privacy>
 - Strictly necessary cookies**
These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
 - Analytical/performance cookies**
They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
28. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
29. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
30. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

Transfers outside the European Economic Area

31. Data which we collect from you may be stored and processed in and transferred to countries outside of the European Economic Area (EEA). For example, this could occur if our servers are located in a country outside the EEA or one of our service providers is situated in a country outside the EEA. These countries may not have data protection laws equivalent to those in force in the EEA.

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32. If we transfer Data outside the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy. You expressly agree to such transfers of Data.

General

33. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
34. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
35. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

Changes to this privacy policy

36. Higgs & Johnson reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact Higgs & Johnson by email at nassau@higgsjohnson.com.

Last updated: 28th May 2019