

Barker Langham understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.barkerlangham.co.uk](http://www.barkerlangham.co.uk) ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

**By submitting your personal information on our Site, you are consenting to the processing of your information by us in accordance with this privacy policy. In particular you acknowledge and consent that the personal data that we collect from you may be transferred to, processed and stored by us at destinations outside the European Economic Area (EEA).**

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Barker Langham Limited (company number 05531073) with registered address at 1 Naorji Street, London, WC1X 0GB, trading as Barker Langham and operating in the UK and Germany, and our group companies including Barker Langham Recruitment Ltd (operating in the UK) and Barker Langham Heritage Consultant Co (operating in the United Arab Emirates)
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
Personal information	Any information relating to an identified or identifiable individual. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

## Important information and who we are

This privacy policy aims to give you information on how Barker Langham collects and processes your personal data through your use of Our site, including any data you may provide through Our Site when you sign up to our newsletters or purchase a product or service from us.

This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

### Controller

Barker Langham Limited is the controller for the purposes of the personal information you have provided to us or we have collected from you through your use of Our Site or for the provision of any services to you as our client.

Barker Langham Limited (operating in the UK and Germany) is made up of different legal entities in the Barker Langham group of companies, consisting of Barker Langham Recruitment Ltd (operating

in the UK) and Barker Langham Heritage Consultant Co (operating in the United Arab Emirates). This privacy policy is issued on behalf of the Barker Langham Group so when we mention Barker Langham, "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Barker Langham Group responsible for processing your data. Barker Langham Limited is the controller and responsible for this website.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Full name of legal entity: Barker Langham Limited

Email address: [info@barkerlangham.co.uk](mailto:info@barkerlangham.co.uk)

Postal address: 1 Naoroji Street, London, WC1X 0GB

Telephone number: +44 (0) 207 278 7847

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Personal information we collect about you**

We may collect and use the following personal information about you:

- your name and contact information, including email address and telephone number and company details
- Information to enable us to check and verify your identity, e.g. your date of birth
- your gender information, if you choose to give this to us
- location data, if you choose to give this to us
- your billing information, transaction and payment card information
- your personal or professional interests
- your professional or personal online presence, e.g. LinkedIn profile, Facebook
- your contact history, purchase history and saved items
- information to enable us to undertake credit or other financial checks on you
- Information about how you use our website, IT, communication and other systems such as IP address, web browser type and version, operating system, a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to

This personal information is required to provide services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

### **How your personal information is collected**

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our Site. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
  - credit reference agencies;
  - client due diligence providers;
  - banks you use to pay us or place orders;
- from a third party with your consent, e.g. your bank or building society
- from cookies on our Site—for more information on our use of cookies, please see our cookies policy
- via our IT systems, e.g.:
  - door entry systems and reception logs;
  - monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

### **How and why we use your personal information**

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so

long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
<p>To provide services to you or to do business with you, including:</p> <ul style="list-style-type: none"> <li>to register you as a new client or a supplier;</li> <li>to carry out our obligations in respect of the provision of the services to you;</li> <li>to manage payments and fees;</li> <li>to collect and recover money owed to us or to you</li> <li>to provide content in line with your preferences.</li> </ul>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests (for running our business, to ensure security, to meet our regulatory compliance and reporting obligations, to recover debts due to us)</p>
<p>To prevent and detect fraud against you or your organisation/business</p>	<p>For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you</p>
<p>Conducting checks to identify our client and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator</p>	<p>To comply with our legal and regulatory obligations</p>
<p>To manage, develop and improve our relationship with you, including:</p> <ul style="list-style-type: none"> <li>notifying you about changes to our terms or privacy policy or our services;</li> <li>providing you with professional assistance as required;</li> <li>developing and improving our services to you.</li> </ul>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p>
<p>Share your information with our group companies for internal management and administration purposes if required in the performance of contracts and services</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>For our legitimate interests (for running our business, internal management and administration and provision of IT services, network security and in the context of a business reorganisation or group restructuring exercise)</p>
<p>To enforce any of our rights against you</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests (for running our business, to ensure security, to meet our regulatory compliance and reporting obligations, to recover debts due to us)</p>
<p>Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring business policies are adhered to, e.g. policies covering security and internet use</p>	<p>For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you</p>
<p>Operational reasons, such as improving efficiency, training and quality control</p>	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can</p>

<b>What we use your personal information for</b>	<b>Our reasons</b>
	deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing client records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
If required, marketing our services and those of selected third parties to: —existing and former clients; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing, former and new clients
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our clients are likely to be able to pay for our services
External audits and quality checks, e.g. for certain accreditation and the audit of our accounts	For our legitimate interests or those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

### **Promotional communications**

We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside our group of companies for marketing purposes.

If promotional communications are sent to you, you have the right to opt out of receiving promotional

communications at any time by:

- contacting us at:
  - Postal address: 1 Naorji Street, London, WC1X 0GB
  - Email address: [info@barkerlangham.co.uk](mailto:info@barkerlangham.co.uk)

If applicable, we may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

### **Who we share your personal information with**

We routinely share personal information with:

- companies within our group of companies (Barker Langham group of companies)
- third parties we use to help deliver our services to you, e.g. payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, e.g. banks, website hosts, IT services providers such as Google, internet service providers, marketing agencies;
- third parties approved by you, e.g. social media sites you choose to link to or third party payment providers;
- credit reference agencies;
- our insurers and brokers, or professional advisers;
- our or your banks;

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, eg in relation to certain accreditation bodies governing our business and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### **Where your personal information is held**

Information may be held at our offices (stored on our in-house server at our offices) and those of our group companies in the UK, Germany and United Arab Emirates, third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your personal information with**'). For email data, we use Google Suite which uses cloud based email data storage. For more information, please refer to Google's privacy policies at:

- <https://policies.google.com/privacy?hl=en>
- <https://policies.google.com/privacy/frameworks?hl=en>
- <https://privacy.google.com/businesses/compliance/?hl=en>
- For the applicable data processing terms between us and Google Inc.:
  - <https://cloud.google.com/terms/data-processing-terms>
  - [https://gsuite.google.com/terms/dpa\\_terms.html?uri=CELEX%3A32016R0679?utm\\_medium=et&utm\\_source=google.com%2Fcloud&utm\\_campaign=gdpr&utm\\_content=commitments\\_to\\_the\\_gdpr&ga=2.225397210.-1500451921.1534158114](https://gsuite.google.com/terms/dpa_terms.html?uri=CELEX%3A32016R0679?utm_medium=et&utm_source=google.com%2Fcloud&utm_campaign=gdpr&utm_content=commitments_to_the_gdpr&ga=2.225397210.-1500451921.1534158114)

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: '**Transferring your personal information out of the EEA**'.

### **How long your personal information will be kept**

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

Please note that different retention periods may apply for different types of personal information. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## Transferring your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), eg:

- with our offices outside the EEA, including our offices in Dubai;
- with your and our service providers which may be located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

The following countries to which we may transfer personal information have been assessed by the European Commission as providing an adequate level of protection for personal information: Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework).

Except for the countries listed above, other non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows:

- a) We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”;
- b) We share your data with external third parties, as detailed in the section “Who we share your personal information with”, that are based outside of the EEA. Unless data protection legislation permits the transfer of your personal data outside the EEA due to a specific exception for such restricted transfers, the following safeguards are applied to such transfers:
  - We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection, or
  - If applicable we will use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR, or
  - Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe.

If you would like further information please contact us (see ‘How to contact us’ below).

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights (known as "subject access request"), please:

- Email or write to us —see below: '**How to contact us**'; and
- let us have enough information to identify you (eg your full name, address and client or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

### **Keeping your personal information secure**

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information. The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### **Changes to this privacy policy**

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy. Continued use of our Site will signify that you agree to such changes.

### **How to contact us**

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

<b>Our contact details</b>
<b>Barker Langham Limited</b> Email address: <a href="mailto:info@barkerlangham.co.uk">info@barkerlangham.co.uk</a> Postal address: 1 Naoraji Street, London, WC1X 0GB Telephone number: +44 (0) 207 278 7847

# COOKIES POLICY

## Information about our use of cookies

### What are cookies?

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our Site to collect standard internet log information and visitor behaviour information.

Cookies allow websites to, among other things, store and keep track of the browsing activities of a user. Depending on the information they contain, and on how you operate your computer, cookies can be used to recognise a user.

There are two main types of cookie:

- **Session cookies**—these are deleted when you finish browsing a website and are not stored on your computer longer than this; and
- **Persistent cookies**—these are stored on your computer after you have finished using a website so that the website provider can remember your preferences the next time you use it

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your computer or other electronic device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you—but only where you voluntarily provide it.

### Third-party cookies

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These third parties are responsible for the cookies they set on our Site. If you want further information please go to the website for the relevant third party. You will find additional information in the table below.

### How do we use cookies?

We use cookies on this Site to:

- recognise you whenever you visit this Site (this speeds up your access to the website as you do not have to log in each time);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content, products and services and to help us better understand our client requirements and interests;
- target our marketing and advertising campaigns and those of our partners more effectively by providing interest-based advertisements that are personalised to your interests; and
- make your online experience more efficient and enjoyable.

The table below shows what cookies we use and why.

Name of Owner	Purpose for the cookie
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Google	Google Inc This is a web analytics service provided by Google Inc which uses cookies to
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Analytics show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (e.g. how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had. For further information, please refer to <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

## **Consent**

There is a notice on our home page which describes how we use cookies and which also provides a link to our privacy policy. By clicking the “Okay. Thanks” option on this notice you are agreeing to the use of cookies. If you continue to use our Site after this notification has been displayed to you, we will assume that you are happy to receive all cookies from our Site for the purposes described in this website cookie policy and our privacy policy.

## **How to turn off Cookies**

You may refuse to accept cookies by activating the setting on your internet browser which allows you to refuse the setting of cookies. Please refer to your internet browser's help section for specific instructions. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Site.

For more information about cookies (including how to set your browser to reject cookies) please visit the website set up by the Interactive Advertising Bureau (Europe) at [www.allaboutcookies.org](http://www.allaboutcookies.org) or go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.