

Our Data Protection Notice

Part 1 – General

Who we are

We are Spratt Endicott Limited, trading as SE, SE-Solicitors, Spratt Endicott and Spratt Endicott Solicitors. We are a company registered in England and Wales (company no. 08030343). We are also regulated by both the Solicitors Regulatory Authority (registration no. 608169) and the Financial Conduct Authority (registration no. 709546). We are a firm offering legal services based in Banbury, Bicester, and Brackley.

We reserve the right to update this notice at any time. We will notify you of any substantial updates. Should there need to be any additional processing or personal data, we will notify you separately.

We are a Data Controller.

This means that we are responsible for deciding how we hold and use personal information about you and explaining it clearly to you. In some circumstances, we are a Joint Controller, meaning that the organisation who provides the data to us, or the organisation we share that data with will also be responsible for deciding how the personal data is held and used. Our registration no. with the Information Commissioner's Office is ZA047907

Who this Data Protection Notice applies to

This Data Protection Notice applies to all clients of Spratt Endicott Limited including prospective and former clients along with employees, representatives of business clients and any other persons who supply personal data for the purposes of complying with our obligations under relevant Anti-Money Laundering Regulations.

Our Promise

To do our best to keep your data safe.

Never to sell, swap or rent your data to third parties.

To give you ways to control the use of your data whenever we can.

Data Protection Contact

If you have any queries about data protection in relation to Spratt Endicott Limited please contact Carol Shaw:

cshaw@se-solicitors.co.uk

52 – 54 The Green Banbury OX16 9AB

01295 204140

Part 2 – Professional Services

How we collect information

We collect personal information directly from our clients, our referrers (such as estate agents), our business contacts and contractors both at the start of the relationship and throughout.

Where the personal data is not collected directly from the data subject, it will have been obtained from one of the following sources:

- the business client – both for the client and any third party.
- the referrer – such as estate agents when clients inform the estate agent that they intend to use us for their conveyancing.
- credit reference agencies – where we carry out due diligence on a client
- professional website – for details of professional accreditations and contact details of suppliers
- Companies House – for due diligence information on business clients including individual personal data in relation to persons with significant control
- SmartSearch – this is an online due diligence system we utilise to assist with carrying out our anti money laundering due diligence checks.
- other parties – this maybe the opposing party in a disputed matter, including their legal representative or the other party to a proposed contract, including their legal or professional representatives. This may also come through third party disclosure.
- mortgage companies – where we are acting on behalf of both the individual client and the mortgage company in respect of the conveyancing.
- other professions – as are involved in the matter including other legal professionals, collection agents, medical professionals etc.

We may also collect information about clients from public sources, such as social media and online searches.

Purpose for Processing Personal Data

The purpose of processing personal data is to fulfil our contractual duties towards our clients in respect of their legal matters and the giving of legal advice in addition to running our law firm in accordance with regulatory and statutory requirements.

Nothing in the Data Protection Act or the General Data Protection Regulations overrides our duty of confidentiality to our clients, to which we are bound by our professional bodies.

The personal data collected for all clients:

- name
- address
- email address
- mobile number
- telephone number
- date of birth

- information revealed during due diligence checks (may include nationality and date of birth and personal data contained on passports and drivers licences or other forms of ID)

Special Category Personal Data

We may collect special category personal data where it is relevant to your legal matter. This can include, depending on the matter.

- Health information – such as where your matter is around employment law discrimination, family cases, personal injury or medical negligence matters, the writing of wills or probate and any matter for which this personal information is necessary.
- Sex life or sexual orientation – this may be processed during employment matters, family matters, personal injury or medical negligence matters and drafting wills and probate matters as necessary. It may also be relevant to dispute matters.
- Political opinions – this may be processed during employment matters and family matters, as necessary. It may also be relevant to dispute matters.
- Religious or philosophical beliefs – this may be processed during employment matters, family matters, personal injury or medical negligence matters and the drafting of wills or probate matters as necessary. It may also be relevant to dispute matters.
- Race or ethnic origin – during employment matters, family matters, personal injury or medical negligence matters and probate matters as necessary. It may also be relevant to dispute matters.
- Trade Union membership – this will be processed where relevant in relation to employment matters or where you have assistance with funding from being a trade union member.
- Genetic data – this may be processed during employment matters, family matters, personal injury or medical negligence matters and probate matters as necessary. It may also be relevant to dispute matters.
- Biometric data – this may be processed during employment matters, family matters, personal injury or medical negligence matters and probate matters as necessary. It may also be relevant to dispute matters.
- Criminal convictions – this may be processed during employment matters, family matters, personal injury or medical negligence matters and as necessary. It may also be relevant to dispute matters and anti money laundering checks.

Children’s Information

Our services include services involving children, where there is an adult acting on their behalf. We only hold and process personal data in relation to children on instruction from a parent or guardian or a close relation in disputed family matters. Personal data relating to a child in relation to them being the beneficiary of a will or trust will be given by the client making or executing the terms of a will or trust. All processing of children’s personal data is on the basis of legal obligation.

Lawful Basis for Processing

The majority of the processing of personal data we carry out is on a contractual basis, under instruction from our clients for legal advice or legal representation.

We also process personal data in accordance with our legal obligations. This includes special category personal data as detailed above. Where we do so, it may be without your knowledge or consent as required or permitted by law. This is due to the nature of a legal firm and our obligations under such legislation as the anti money laundering regulations, in addition to our duties to the courts.

The Legitimate Interests for the Processing

We may process small amounts of personal data in relation to individuals within potential business clients on the basis of Legitimate Interests prior to the business becoming a client and a contractual relationship being entered into. This would be in our interest to attract a potential client. The personal data processed would be contact information which was either available publicly or through a profile on a platform such as LinkedIn (adhering to the platform terms and conditions).

The Recipients or Categories of Recipients of the Personal Data

We do not sell, swap or rent personal data to third parties. We do not share personal data for marketing purposes. We do not pass on or share personal data where there is no legal basis to do so.

We pass on personal data to third party suppliers and others in relation to the legal matters or advice we are instructed in relation to.

For the purpose of meeting our legal obligations we pass personal data on to the courts and tribunals, counsel, legal representatives of other parties involved in the matter, government agencies, such as the National Crime Agency or the Treasury and other legal professionals.

We use a wide range of third party companies and consultants to assist with fulfilling our contractual and legal duties. At Appendix A is a table containing the third party companies and organisations Spratt Endicott Limited typically contracts with and a list of the data that would typically be provided to them, in addition there are categories of third parties Spratt Endicott Limited would provide personal details to, depending on the type of legal matter or advice.

The Details of Transfers of the Personal Data to any Third Countries or International Organisations

The Spratt Endicott Limited servers are on hosted within the UK and the majority of processing by ourselves and any third party we contract with, is within the EEA. However, some of our suppliers are outside of the EEA and are based in the USA, such as Microsoft, MailChimp, SmartSurvey, LogMeIn and GoToMeeting. We ensure that all such providers are either subject to model contractual clauses and / or the US/EU Privacy Shield to protect your personal data outside of the EEA.

The Retention Periods for the Personal Data

Due to the types of legal work we carry out on behalf of clients, our retention periods vary. As a general guide:

We will retain your contact details (name, address, telephone numbers, email addresses) for 6 years after the end of our relationship in both electronic and physical format, unless one of the following apply:

- The matter or advice involves children, then the matter will be retained until the youngest child reaches 18 and either 6 years or any of the following;
- The matters is the writing of a will or a probate matter, the personal data will be retained for 30 years after the end of the matter as there can be further tax implications in this period
- Where we store the will, the personal data will be retained until the matter reaches probate, or the will is requested. The maximum period we will store a will for is 100 years.

- Emails are retained for 10 years in archive.
- Where there is a complaint or claim against the firm the archived retention period will begin from the resolution of the complaint or claim.
- Any evidence collected to comply solely with our Anti-Money Laundering obligations will be retained until 6 years from the date on which the particular transaction completed (where the evidence is specific to the transaction).
- At present, information within our practice management system is not deleted. We are changing systems to address this issue.

The Rights Available to Individuals in Respect of the Processing

Individuals have the following rights in relation to the personal data used for marketing information:

- The Right to be Informed – this data protection notice tells you about the processing or personal data, your rights and our responsibilities. We will keep you informed of any changes to this notice and where there are any issues that arise that affect you.
- The Right to Access – you can write to the data protection contact on the above details to request what personal data is held about you. We will confirm that you are the correct data subject and it will take up to 30 days from the original request to send a full response.
- The Right to Rectification – if any of your data is incorrect or requires updating, please notify the data protection contact on the above details and the data will be rectified within 72 hours.
- The Right to Restrict Processing – you have the right to request that the processing of your personal data be restricted. We may not have to grant this right where processing is for the purpose of contractual or legal obligations. Any request for restriction will receive a response within 14 calendar days.
- The Right to Erasure – you have the right to request that data held on you be erased. We do not have to grant this right where processing is for the purpose of contractual or legal obligations. Any request for erasure will receive a response within 14 calendar days.
- The Right to Data Portability – you have the right to request to take the personal data you have given to us with you. Any request for a data transfer will receive a response within 14 calendar days. As a client, you have the right, separate to your rights under the GDPR, to request your file, as detailed in the Terms of Business.
- The Right to Object to Processing – you have the right to object to processing of your personal data. We may not have to grant this right where processing is for the purpose of contractual or legal obligations. Any objection to processing will receive a response within 14 calendar days.
- Rights in Relation to Automated Decision Making and Profiling – you have rights in relation to automated decision making and profiling. Our due diligence system, Smartsearch, carries out an algorithm to decide whether you have passed due diligence. Where an individual does not pass the Smartsearch check, this is referred to our money laundering team for review. The decision of whether due diligence is passed is not an automated decision, but automated decision making forms a part of the process.

The Right to Withdraw Consent

Where processing is based on consent, you have the right to withdraw such consent whenever you choose.

Your rights in relation to terminating the contract are contained within the Terms of Business.

The right to lodge a complaint with a supervisory authority

Please let us know if you are unhappy with how we have used your personal information.

You also have the right to complain to the Information Commissioner’s Office.

Details of how to are available on their website: <https://ico.org.uk/concerns/>

Or you can write to the ICO at: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Or you can telephone the ICO on: 0303 123 1113

The details of whether individuals are under a statutory or contractual obligation to provide the personal data

We are under a statutory duty to request personal data from client in relation to due diligence processes. Where this is not provided, we cannot offer our services.

Personal data requested from a client are all in respect of our contractual obligation to progress your legal matter or give advice, or as a legal obligation.

Thanks for taking the time to understand how Spratt Endicott will use your data and thank you for trusting us with your personal data.

Department /Process	Data Item	Data Subject	Legal Basis	Purpose for collecting	Third Parties involved	Reason
General Client take on and relations inc. internal firm management	Name Address Telephone number Email address Passport number and information Drivers Number Bank details Financial details	Client and Potential Client	Contract, Legal obligation	To enter into and maintain the retainer with the client to carry out legal matters and advice. To comply with the legal, regulatory and managerial requirements of the firm	Smartsearch – shared with / provided by Regulatory Bodies – shared with Statutory Bodies – shared with Our Insurers – shared with Our Quality Assessor – shared with Survey Monkey – shared with Telephone companies – shared with Data room provider – shared with Our professional advisers – shared with Microsoft Exchange – shared with Mime cast – shared with Storage companies – shared with	Smartsearch is an online due diligence tool used to help comply with our legal obligations. We may need to provide your personal data to a regulatory body when legally required to. We may need to provide your personal data to a regulatory body when legally required to. We may need to share your personal data with our Insurers where there is a claim against us. Our quality assessors may see your personal data while on our premises but they do not receive or take any copies of personal data. SmartSurvey is used to provide client feedback forms. Limited contact

Department /Process	Data Item	Data Subject	Legal Basis	Purpose for collecting	Third Parties involved	Reason
						information is provided to them. Personal data may be shared with our telephone companies during voice mails or call recording. Personal data may be shared with our data room provider to give access the room to the client. The documentation within is not visible. Microsoft exchange is used for the exchange of emails. We use Mimecast for email archive and email security checks. Storage companies store our archived files but the only personal data they see are the file numbers and names.
Family, Dispute Resolution , Commercial Recoveries (including Defended) and Employment	Name Address Telephone number Email address Passport number and information Drivers Number Bank details National Insurance Number NHS Number Other identification numbers Financial details Location data Images Racial or ethnic origin Political opinions Religious or philosophical beliefs Genetic data Biometric	Client and others involved in the matter (including children)	Contract with client. Legal obligation	Contractual, to represent and advise the client in the legal matter. Legal obligations, for our professional duties. Other than the information listed in the row above, we do not collect this personal data in every matter – it is purely as required for the case we are instructed in.	Depending upon the circumstances of the case Courts and legal services (including abroad) – shared with Statutory bodies, social services and Government Agencies (including abroad)– shared with / provided by Mediation services including ACAS – shared with / provided by Estate agents, surveyors and conveyancers – shared with / provided by Medical professionals – shared with / provided by Process servers and bailiffs – shared with / provided by Educational institutions – shared with Charities (such as CAB and Contact	To progress the matter to a conclusion using the court system. Overseas courts are used when the matter has an overseas element. As required by our legal and professional obligations and to progress the matter. Mediation services may be required in the matter. Where property requires valuation or sale, estate agents etc will be contacted on the client’s behalf. Matters may require medical information or reports in order to be progressed. It may be necessary to instruct process servers to serve notices on the other parties and to instruct bailiffs to recover possessions. In some cases with children it is

Department /Process	Data Item	Data Subject	Legal Basis	Purpose for collecting	Third Parties involved	Reason
	data Health data Sex life or sexual orientation Criminal convictions				Centres) – shared with Financial institutions – shared with Other legal and financial professionals – shared with / provided by Other parties and their legal professionals Expert witnesses	necessary to contact educational institutions. It may be appropriate to involve charities in some matters. The matter may require close examination of finances, in which case financial institutions may need to be approached. We may instruct counsel and other legal or financial experts. Communication with and disclosure to the other parties is a key part of family matter work. Expert witnesses may be required in a matter
Private Capital	Name Address Telephone number Email address Passport number and information Drivers Number Bank details National Insurance Number NHS Number Other identification numbers Financial details Location data Images Racial or ethnic origin Political opinions Religious or philosophical beliefs Genetic data Biometric data Health data Sex life or sexual	Client, beneficiaries, and others involved in the matter (including children)	Contract with client. Legal obligation	Contractual, to represent and advise the client in the legal matter. Legal obligations, for our professional duties. Other than the information listed in the first row, we do not collect this personal data in every matter – it is purely as required for the case we are instructed in.	Depending upon the circumstances of the matter Medical professionals – shared with / provided by Legal professionals – shared with / provided by Family members – shared with /provided by Tracing agent / genealogists – shared with / provided by Embassies – shared with / provided by The press – shared with Financial institutions – shared with Statutory bodies including HMRC – shared with Other legal and financial professionals – shared with / provided by Other parties and their legal professionals Expert witnesses.	Medical professionals may be engaged where there are doubts around the mental capacity of the client. Counsel and other legal professionals may be required within the matter. It may be necessary to discuss matters with family members as allowed for within the matter. Instructing tracing agents etc maybe necessary to trace beneficiaries and would include some personal data. It may be appropriate to share personal data with financial institutions on order to release funds etc. There maybe legal obligations to share personal data with statutory bodies such as HMRC. We may instruct counsel and other legal or financial experts. Where there are other parties involved, we may be

Department /Process	Data Item	Data Subject	Legal Basis	Purpose for collecting	Third Parties involved	Reason
	orientation Criminal convictions					obliged to share some personal data with them. Expert witnesses may be required in a matter
Company Commercial and Commercial Property	Name Work address Personal address Work email Personal email Work telephone number Personal telephone number Date of birth	Sole trader and small partnership commercial clients, individual contacts, Persons with Significant Control and directors within business organisations	Contract with client Legal obligation	Contractual, to represent and advise the client in the legal matter. Legal obligations, for our professional duties.	Other parties involved in the matter, including their legal representatives – shared with Counsel and other legal and financial professionals – shared with / provided by Courts and tribunal services – shared with Statutory bodies such as Companies House, Land Registry, HMRC – shared with other professionals such as accountants, surveyors, estate agents and land agents – shared with / provided by Financial institutions	Shared with other parties as required to progress the matter. Shared with other professional advisers including counsel in order to progress the matter. Shared with the court services where necessary to resolve issues. Shared with statutory bodies as required for registrations or under legal obligations. Shared with other professionals as required to progress the matter. Shared with financial institutions in order to progress the matter
Residential Property	Name Address Telephone number Email address Passport number and information Drivers Number Bank details Financial details Date of birth National Insurance Number Mortgage account number Health information Work address Work	Client. Other occupant of property. Contact within mortgage company	Contract with client Legal obligation	Contractual, to carry out the conveyancing matter for the individual client and mortgage company. Legal obligations, for our professional duties. Health data is only ever collected if necessary for the matter.	Other client (where representing individual and mortgage company) – shared with / provided by Lenders including Help to Buy schemes – shared with / provided by Conveyancers representing other party – shared with Land registry – shared with Management company – shared with Statutory bodies including HMRC / Inland Revenue – shared with Estate Agents – shared with Insurer – shared with Financial Advisers	If also representing mortgage company, for contractual reasons. Shared with Lenders to execute client contract. Shared with other party conveyancers to execute client contract. Shared with Land registry to execute client contract. Management companies to execute client contract. Statutory bodies to comply with legal obligations. Estate agents to facilitate sale. Financial advisers to facilitate contract

Department /Process	Data Item	Data Subject	Legal Basis	Purpose for collecting	Third Parties involved	Reason
	telephone number Work email address					

Part 3 – Events

Data we receive:

Depending on the nature of the event, seminar, networking event, drinks party or social gathering organised by Spratt Endicott Limited (“the event”) we will receive the following data from you or someone within your organisation:

- Attendees name
- Organisation
- Job title
- Email address
- Contact information (where provided)
- Payment confirmation (not account or payment card details)
- Food preferences
- Specific accessibility requirements.

What we do with it:

Create an attendance record for the day.

Send anonymised data to the venue, including number of attendees, dietary requirements and accessibility requirements.

Analyse this data to review the impact of the event.

Send a feedback form to you to assist with analysis of the event.

What we do NOT do with this data:

Pass onto third parties.

Opt you into Spratt Endicott Limited marketing material.

On the day

During events, we will be taking photographs and posting about the events (where appropriate) on social media and our website.

By attending our events, you agree that we may use, reproduce, and/or publish in any way whatsoever (without any payment being due to you) any photographs and/or video/audio that may pertain to you (including your image, likeness and/or voice), and that it may license others to do the same. Names will not be attributed to images.

This material may be used (without limitation) in various publications, public affairs releases, recruitment material, broadcast material, internal publications, the Spratt Endicott Limited website/s or for other related endeavours. This authorisation is continuous and may only be withdrawn with the prior written agreement of Spratt Endicott.

If you do not wish for your photograph to be taken, please inform a member of our staff at the event.

If we wish to quote you, we will ask for your specific permission first.

Record Retention

Photographs of the event will be kept within our archive.

The attendee list will be kept for 4 years.

The feedback forms will be retained for 4 years.

Events held with third parties

If the event is being jointly run with a third party, this will be clearly promoted. If personal data is to be shared with the joint third party, sponsors, exhibitors, speakers or the organisation they represent it will be clearly notified on the literature or invitation. To understand how a third party will use your data, we will link to Privacy Policy or notify you how to obtain a copy.

Should you have any questions about our privacy policy, please contact us by emailing enquiries@se-solicitors.co.uk.

Part 4 – Marketing & Subscriptions

Purpose for Processing Personal Data

The purpose of processing Personal Data is to send you one or more of our newsletters, information about our events, legal updates and other marketing information, as you choose from the options available. The information sent may be targeted geographically or based on sector, which is why we have optional fields.

The personal data collected and processed are:

- email address
- name
- postcode
- IP address
- organisation (optional)
- industry (optional)
- job title (optional)

For information about how your data is used when attending events, please see the Data Protection Notice – Events.

Lawful Basis for Processing

The basis for processing this personal data is your consent. Once given, you may withdraw your consent at any time by using the 'unsubscribe' button. You may also choose to change your preferences to control what information you are receiving.

The Legitimate Interests for the Processing

Spratt Endicott Limited legitimate interest in processing is to inform clients, contacts and potential clients of changes in the law, articles of interest to them and to invite individuals to events which may be of interest.

The Recipients or Categories of Recipients of the Personal Data

We use MailChimp to manage our marketing lists. MailChimp are a widely used marketing mailing platform based in the USA. MailChimp subscribe to the EEA / USA Privacy Shield.

Where the event requires a ticket, we will use Eventbrite. Eventbrite are also located in the USA and also subscribe to the EEA / USA Privacy Shield.

The Details of Transfers of the Personal Data to any Third Countries or International Organisations

Any personal data held by Spratt Endicott Limited is held within the UK.

Personal data processed via MailChimp and / or EventBrite is held on their servers in the USA. Both organisations are subject to the terms of the EEA / USA Privacy Shield.

The Retention Periods for the Personal Data

Personal data will be held for as long as you are subscribed to the marketing / subscription list.

After leaving the mailing list your email address will be held within the suppression list on MailChimp, this ensures that you do not receive further marketing emails and the data is only processed to prevent the sending of unwanted emails. We do not put a retention period on such data, but review the lists and processes every 5 years.

Personal data may be utilised in internal analysis of the effectiveness of subscriptions / marketing campaigns. Such data will be held for a maximum of 6 years.

The Rights Available to Individuals in Respect of the Processing

Individuals have the following rights in relation to the personal data used for marketing information:

The Right to be Informed – this Data Protection Notice tells you about the processing of personal data, your rights and our responsibilities.

The Right to Access – you can write to dataprotection@se-solicitors.co.uk to request what personal data is held about you. We will confirm that you are the correct Data Subject and it will take up to 30 days from the original request to send a full response.

The Right to Rectification – if any of your data is incorrect or requires updating, you can manage this through your preferences on MailChimp at any time.

The Right to Restrict Processing – if you wish to restrict the processing, you may change your preferences relating to what mailing lists you are subscribed to. As noted at point 3, we only process personal data provided in this context to send event invites, newsletters, legal updates and other listed information to you. This is only shared with our email platform provider, MailChimp. If you chose to come to a ticketed event, tickets will be booked or purchased via Eventbrite and your data will be processed by them under their Terms and Conditions.

The Right to Erasure – if you no longer wish to receive any of the subscriptions then, upon request, we will erase the personal data held about you save for retaining your details within our 'suppression list'. The suppression list ensures that you do not receive the emails you have requested not to. We will erase your personal data from our internal analysis.

The Right to Data Portability – where requested, within 30 days of request Spratt Endicott Limited will provide a break down in.csv format of the personal data of the data subject, to include subscriptions.

The Right to Object to Processing – if you no longer wish to receive any emails, then you may update your preferences and your data will not be processed for marketing. If you wish to be removed from our internal analysis please let us know at the above details and we will cease the use of any personal data from this.

Rights in Relation to Automated Decision Making and Profiling – as detailed at point 13, we carry out very limited automated decision making and profiling in relation to events and publications / updates which may be of interest to you. This is dependent upon your preferences and the post code or optional information you have provided. If you have any concerns around this, or wish to know whether any profiling has been applied to your personal data, please contact us as above.

The Right to Withdraw Consent

At any time, you may withdraw your consent for receiving these newsletters / information about events or services by using the 'unsubscribe' button. You may manage your preferences to withdraw consent from whichever lists you are subscribed to, whether it be one, some or all.

The right to lodge a complaint with a supervisory authority

Please let us know if you are unhappy with how we have used your personal information.

You also have the right to complain to the Information Commissioner's Office.

Details of how to are available on their website: <https://ico.org.uk/concerns/>

Or you can write to the ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Or you can telephone the ICO on: 0303 123 1113

The details of whether individuals are under a statutory or contractual obligation to provide the personal data

There are no statutory or contractual obligations to provide personal data for the purpose of marketing and subscriptions. This is purely on a consent basis where you wish to receive such information.

The details of the existence of automated decision-making, including profiling

Depending on your opt in choices, you may be sent information about publications, legal updates and events dependent on your geographical location (post code), organisation, or role. This is the only profiling conducted for the purpose of marketing and subscriptions.

Thanks for taking the time to understand how Spratt Endicott will use your data and thank you for trusting us with your personal data.

Part 5 – Website Usage

Google Analytics

This site uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a number of cookies (default is 4) in order to evaluate your use of the site and compile reports for us on activity on the site.

Google stores the information collected by the cookie on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

Google Inc are members of the US Safe Harbor Scheme. This scheme allows the transfer of data from within the EEA to countries that are outside of the EEA without having to enter into a specific data transfer agreement. Companies that sign up to the scheme are deemed to provide adequate protection for personal data transmitted from Europe. Google Inc's registration is at <https://safeharbor.export.gov/companyinfo.aspx?id=10543>.

For more information on the cookies set by Google Analytics please go to: <https://code.google.com/apis/analytics/docs/concepts/gaConceptsCookies.html>.

Google has also created their own opt-out plugin which you can get from: <https://tools.google.com/dlpage/gaoptout>.

In addition to the cookies set by Google Analytics, this plugin will create a session based cookie (which will expire when you close your browser) containing a single "true" or "false" value, reflecting your choice.