

## PRIVACY POLICY

### 1. Background

Cameron Intellectual Property Ltd (hereinafter “Cameron IP”, “we” or “us”) is firm of UK & European Patent, Trade Mark and Design Attorneys. Under the EU General Data Protection Regulation (“GDPR”), and the United Kingdom’s Data Protection Act 2018 (“DPA”), Cameron IP is the Data Controller of your personal data. We are registered as a Data Controller at the Information Commissioner’s Office under registration number: A8350651.

The GDPR and DPA provide the legal basis on which we may collect, store and use personal data. This privacy policy describes the different types of personal data that we may collect from you; explains how we will safely store that data; and explains how that data may be used by us.

Any questions concerning this privacy policy (effective from 25 May 2018) should be directed to [mail@cameronintellectualproperty.com](mailto:mail@cameronintellectualproperty.com).

### 2. Core Principles

We will ensure that your personal data is collected and processed only for specified necessary and lawful purposes; is updated to reflect any changes which come to our attention; is kept secure; is made available for inspection upon request; and is never sold to third parties.

### 3. Data We May Collect

We are unable to provide our professional services in the field of intellectual property without collecting and processing certain types of personal data from you. We may collect and store the following types of personal data from clients, prospective clients and suppliers:

Data Type	Description
Identifying Data	name, title, date of birth, gender, scanned copies of driving licences, utility bills or similar identification documents
Contact Data	residential/business addresses, telephone/facsimile numbers, email addresses
Company Data	job titles, company names, Companies House data
IP Data	Bibliographic data from your existing published IP rights
Financial Data	bank details, credit rating, payment/transaction history
Preference Data	dietary requirements, marketing communication preferences
Feedback Data	Survey responses and details of complaints
Other Data	CCTV images, curricula vitae, passwords for accessing our online services

### 4. How We Collect Data

We may use the following methods to collect data from you, or about you:

Source	Description
Historical	We already hold data in our records systems collected prior to implementation of the GDPR legislation on 25 May 2018.
From You	We may receive data from you directly. Data can be received via normal correspondence (e.g. email, post, telephone, facsimile); or via dedicated forms on our websites
Automated	When you use our website or online services we may automatically collect data identifying your device, browser, geographical location, and usage. This data is collected via cookies and analytics software such as Google Analytics.
From Your Employer	We may receive data from your employer when this is necessary to provide our professional services. We may obtain data from your employer's website.
Third Parties	We may collect data from various publicly available third-party sources such as Companies House, social media and networking applications, and websites.

## 5. How We Store Your Data

We securely store and process any paper copies of your personal data in our United Kingdom offices. However, as a predominantly paperless organisation, your personal data may also be stored in secure, professional data centres with mirrored hosting facilities for redundancy and disaster recovery purposes. Some of the data centres may be located outside of the United Kingdom and EEA. Any personal data stored on third party systems based in the United States is EU-U.S. Privacy Shield compliant – see: <https://www.privacyshield.gov>. These include Google, Wordpress, Microsoft and MailChimp.

## 6. How We Use Your Data

We will use the data we collect for one or more of the following lawful purposes:

Data Type	How is it Used	Legal Basis for its Use
Identifying Data Contact Data Company Data Financial Data	Due diligence as part of new client onboarding procedures	Necessary for our legitimate interest in providing you with our intellectual property services; and in satisfaction of our obligations under the Money Laundering Regulations 2007.
Identifying Data Contact Data IP Data	To enable us to apply for, and maintain, registered intellectual property rights; and initiate legal proceedings on your behalf.	Necessary for our legitimate interest in providing you with our intellectual property services; and fulfilling any contractual obligations to you.
Identifying Data Contact Data Feedback Data	To respond to complaints or any legal proceedings against us.	Necessary for defending our legitimate interest.
Identifying Data Contact Data Preference Data	Marketing our existing or future services to you; and arranging events or seminars.	Necessary for our legitimate interest in marketing our intellectual property services to prospective and existing clients; and arranging events or

		seminars to which you have subscribed.
Other Data	Considering and responding to job applicants as part of our recruitment activities.	Necessary for our legitimate interest as a provider of intellectual property services
Other Data	Capturing CCTV images for crime prevention purposes.	Necessary for our legitimate interest in protecting our premises and staff and prevention and detection of crime.

## 7. When We Share Your Data with Third Parties

To provide our intellectual property services, we may be required to share your personal data with Courts and/or national/international intellectual property offices (IPOs), including the UK Intellectual Property Office, the European Patent Office and the EU Intellectual Property Office. Where we act for you directly before those IPOs we are both the data controller and the data processor.

To provide our intellectual property services in other jurisdictions (including outside the EEA) we will need to work with, and pass relevant personal data to, overseas attorney associates. Those overseas attorney associates will share your personal data with the local IPO in the relevant country. Where we act for you indirectly in such circumstances we will be the data controller and the overseas attorney associate will be the data processor.

To provide our intellectual property services, we may also share your personal data with third-party IP services providers such as barristers, advocates, patent renewal providers, patent translation providers, patent validation providers, professional illustrators, patent searching providers, IP insurance brokers, IT service providers, HMRC, accountants, events management companies, and other professional advisors.

We limit access to your personal data such that it is provided only to those of our employees, suppliers or other third parties with a legitimate business-need for accessing that data.

## 8. Data Retention Period

We will retain your personal data for no longer than is necessary to fulfil the purpose(s) for which it was collected; and for satisfying any legal, tax and regulatory requirements. Factors considered for determining the duration for which personal data is to be held include the amount, nature and sensitivity of the personal data concerned, and the duration on any registered intellectual property rights obtained on your behalf.

## 9. Your Legal Rights

You may contact us at [mail@cameronintellectualproperty.com](mailto:mail@cameronintellectualproperty.com) to exercise any of your following rights under the GDPR and DPA:

Right	Description
Access	You may ask us to provide a copy of the personal data we hold about you, i.e. a "data subject access request".
Correction	You may ask us to correct any errors or incomplete personal data.

	Depending upon the type of data concerned, we may require you to provide us with evidence to verify the accuracy of the correction.
Deletion	You may ask us to delete some or all of your personal data if you consider that it is no longer required to fulfil the purpose(s) for which it was obtained; if you withdraw your consent to our continued use of the data; you successfully exercise your right to object to processing of your data; or when we have processed your data unlawfully. NB: in certain circumstances, exercising your right to deletion may result in us no longer being able to provide you with our intellectual property right services.
Objection	You may object to our processing of your personal data even where we rely on a legitimate interest for doing so. In particular, you have the right to object to our processing of your personal data for direct marketing purposes.
Restriction	You may ask us to restrict how we process your personal data in certain circumstances, e.g. to establish the accuracy of the data; to assess any objections you have made to the use of your personal data; or you want us to continue holding your data even after we no longer require it because you may require it for another purpose.
Transfer	You may ask us to transfer your personal data to a third party in a machine-readable format.
Withdraw	You may at any time withdraw your consent to our continued processing of your personal data. NB: in certain circumstances, exercising your right to deletion may result in us no longer being able to provide you with our intellectual property right services.

We will endeavour to respond to all legitimate requests to exercise any of the above rights within 28 days. Should this not be possible, e.g. due to the complexity or number of requests made, we will confirm when we expect to be able to do so. For data security purposes, we may ask you to provide certain information to us to help confirm your identity and verify your right to access the personal data. You will not normally need to pay any fees to access your personal data.

## 10. Further Information

Any questions or requests arising from this privacy policy should be directed to:

Stewart Cameron  
Cameron Intellectual Property Ltd  
Moncrieff House  
69 West Nile Street  
Glasgow  
G1 2QB

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[mail@cameronintellectualproperty.com](mailto:mail@cameronintellectualproperty.com)