VEDDER PRICE LLP CLIENT DATA PROTECTION AND PRIVACY STATEMENT

Introduction

In this Statement, "we", "our" and us" refers to Vedder Price LLP of 4 Coleman Street, London EC2R 5AR which, for the purpose of the Data Protection Act 1998, is the data controller.

We regard our client's affairs as confidential in accordance with the best practices of the legal profession. In the course of our acting for you, we will receive information relating to you, your employees and associates. In this Statement, we refer to this information as "personal information."

How we use your personal information

We shall use personal information and share it with Vedder Price partners, staff and consultants for the purpose of providing services to you. We shall also use and disclose personal information so far as required to carry out your instructions.

We may use personal information and share it with Vedder Price P.C., an affiliated law firm that operates in the United States, for the purposes of providing services to you. Sometimes we may need to transfer your personal information to countries which do not provide the same level of data protection as the UK. If we do have a need to make such a transfer, then we will put a contract in place to ensure that your information is adequately protected and your privacy respected. We have such an agreement with Vedder Price P.C. to govern any transfer of information and data between us and our affiliated firm.

We may use personal information to notify you about important legal developments and services which we think you may find valuable, or for sending you newsletters, invitations to seminars and similar marketing. We may contact you by post, fax, e-mail or telephone. You may tell us if you do not wish to receive this information by writing to us at 4 Coleman Street, London EC2R 5AR.

We may transfer personal information to a successor firm or company which acquires the legal practice carried on by Vedder Price LLP. If this happens, we will require the firm or company to which we transfer personal information to observe standards of data protection and privacy no less secure than those set out in this Statement.

Save as described in this Statement, personal information will be retained by us and will not be sold, transferred or otherwise disclosed to any third party, unless such disclosure is required by law or court order.

E-mail

Whilst every member of the Vedder Price LLP team has a personal private e-mail address, e-mail which you send to us or which we send to you may be monitored by Vedder Price LLP and/or Vedder Price P.C. to ensure compliance with professional standards and our internal compliance policies. Monitoring is not continuous or routine, but it may be undertaken on the instruction of a partner where there are reasonable grounds for doing so. Occasional spot checks or audits may also be undertaken on the instruction or with the authority of a partner. E-mail monitoring/blocking software may also be used.

Third-party processors

Our information technology systems are operated by Vedder Price P.C., but some data processing in relation to web and e-mail services is carried out on our behalf by a third party. We endeavour to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal information.

Where we process personal data for you

In providing services to you, we may process personal data on your behalf as "data processor" for the purposes of the Data Protection Act 1998. Where we act as your data processor:

- 1. we shall process personal data solely for the purpose of providing services to you or otherwise in accordance with your instructions;
- 2. we shall have in place technical and organisational security measures which shall be of a standard generally observed in the legal profession, including measures which guard against unauthorised or unlawful access to, or alteration, disclosure or destruction of, personal data and against accidental loss or destruction of or damage to personal data;
- 3. you confirm that you are authorised to provide to us the personal data which we shall process on your behalf.

Your rights

Under the Data Protection Act 1998, you are entitled to request a copy of the information we hold about you and, if the details are inaccurate, you may request that we amend them. You should do so by writing to us at the address below. We charge a fee for responding to such requests in accordance with the Act.

Changes to this Statement

We may change our Data Protection and Privacy Statement from time to time. The current version will always be available from us in hard copy or on our website.

Vedder Price LLP 4 Coleman Street London EC2R 5AR

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