

**Blackthorne Legal Support Services Limited
T/A Blackthorne**

Privacy Notice & Cookie Policy

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PART A. PRIVACY NOTICE

Introduction

What this policy is for

This Policy explains how we collect, use and disclose information about you. By using your information, we can provide the product or service you've asked for. The use of your information helps us understand what your interests in us are and provide personalised information that meets your requirements.

Your consent

By completing our forms (for example through our website or sent to you following your request, or by the continued use of our information services), you consent to the use of your personal information in accordance with this Policy. This includes any sensitive personal information that you may provide, such as details of any medical conditions, sexuality, political affiliation or leaning, union membership etc. that you may mention in a post or in an email to us in relation to a request for information.

YOU MAY WITHDRAW SUCH CONSENT AT ANY TIME BY EMAIL, info@blackthorneinv.co.uk

Blackthorne Legal Support Services Limited ("Blackthorne") is a private limited Company and registered at Companies House, number **04366395**. The company's registered office can be found on the website contact's page, <http://www.blackthorneinv.co.uk/index.php/contact/>

Blackthorne is an Investigative and Litigation Support Services company providing professional services and reports to both private and public bodies. Blackthorne abides by standards set by the Association of British Investigators for its conduct and activities in order to provide a safe environment for the public to be referred as a professional when in need for investigative, or litigation support services.

Blackthorne will collect, use and disclose personal information in line with this Policy.

Collection of information

Registration, forums, forms and your dealings with us

We collect information about you when you provide it to us. For example, when you fill out our online forms, respond to one of our promotions, enquire about our products and services or participate in a reader forum (which could be online through our website or by email), by telephone or in person, or on paper. If you telephone us or if we call you, the call may be recorded for quality, training and management purposes. We may also record customer enquiries via online chat for the same purposes.

Information from devices

We also collect information indirectly from you, from the device you may be using when you interact with our website or use our apps. This can include your geographic location, which for example may be required to provide services to you that have relevance. We may also collect information from cookies placed on your computer or your device. See our Cookie Policy below for more information about our use of cookies.

Social login

If you log in to our website or online services through a third party site, such as Facebook, that site may pass information to us, such as, user ID, name associated with the ID, email address and location, plus other information permitted under the privacy policy for that website. Our website may also return information about you to that social networking site regarding your login.

Posts, comments and interaction

When someone enters into a conversation with us, for example through the use of polls, comments, text messages, email, phone, registration or forms and letters we reserve the right to display this content indefinitely in any relevant context but will be anonymised in the case of testimonials or customer services.

Public information and posts

Any information about yourself or others that you submit on social media sites, including chat rooms, blogs and forums, will be viewed by other people. As such, this personal data may be viewed, collected and used by third parties, including search engines, over which we have no control. We are not responsible for either the information you submit/post or otherwise make available in such public areas or any use that may be made of such information by any third party.

Other sources

We may also obtain information about you from other companies that have your permission to share information about you, as well as from other online and offline sources. We may combine this information with information we collect directly or indirectly from you.

Information about other people

In the absence of a legitimate interest, by giving us information about another person, you confirm that they have appointed you to act for them, for you to provide us with their information, including sensitive personal data, and to the transfer of their information abroad and to receive on their behalf any data protection notices.

How we use and share your information

Deliver services, improve experience and personalisation

We will use your information to provide you with membership administration, the requested products and services or request for assistance, to provide a greater personalised experience and to manage our relationship with you, including allowing you to interact, comment, and participate in online surveys. We may use your information to monitor and improve and protect our products, content, services and website, both online and offline. We may also provide you with help and support where we believe it is required. For example, we may contact you where a registration or application for membership is not completed, if you have provided your information.

The content on our website and in our communications with you may be adjusted depending on what we know about the content, products and services that you may be interested in. We provide personalisation by using cookies, IP addresses, web beacons, URL tracking and app settings. See our Cookie Policy below for more information about how we use these.

Market research and analytics

We may use your information to conduct market research in order to improve the services we offer and to develop new products and services.

Deliver relevant advertising

We use targeted advertising to provide online or email promotions that we believe are more relevant to your interests.

Relevant communications

Unless you have told us otherwise, we may use your information to send you newsletters, bulletins and other information about us and our services, projects or campaigns.

Direct marketing

This may include communications by post, telephone, email and messages to your mobile phone and through social media (such as Facebook and Twitter) about us and our business partners' products and services, events and offers, including for a reasonable time after you may have ceased a subscription or service with us.

Sharing with third parties

We will only disclose your information to associated or third party companies for their purposes, including marketing, when we have your permission to do so.

Linked services

Our services may be linked to websites operated by third party companies, and may carry advertisements or offer content, functionality, games, newsletters, contests, sweepstakes, or applications developed and maintained by unaffiliated companies. We are not responsible for the privacy practices of unaffiliated companies, and once you leave the services or click an advertisement you should check the applicable privacy policy of the other service.

Allowing social sharing functionality

By logging in with or connecting your account with social media, you are permitting us to share information we collect from and about you with that social media provider, other users and your friends, and you understand that the social media service's use of the shared information will be governed by the social media service's privacy policy. If you do not want your personal information shared in this way, please do not connect your social media service account with your account, and do not participate in social sharing on our website or apps.

Disclosures required by law

Your personal information will be disclosed where we are obliged by law to do so. We may also disclose your personal information where we are allowed by law to protect or enforce our rights or the rights of others and for the detection and prevention of crimes, such as fraud.

Acceptable use of services

If you post or send offensive or objectionable content anywhere on or to our website, forums or apps, or otherwise engage in any disruptive behavior on our website, forums or apps, we may use the information that is available to us about you to stop such behavior. This may involve informing relevant third parties such as your employer, known business associates, trade bodies and law enforcement agencies about the content and your behavior.

Sale of our business

If we sell part or all of our business, customer information may be one of the transferred business assets. If this happens, your information may be disclosed to any successors of our business for them to use for the purposes set out in this Policy.

Payment and credit checks

Customer information will be used to take payment for products and services and may be used to verify credit details related to this payment. Permission to do so is implicit in providing financial details to process payment. Direct debit or PayPal information may be retained for ease of renewal of services.

If you request or are granted credit, then, in order to help us to make credit decisions about you, prevent fraud, check your identity and prevent money laundering, we may search the files of credit reference agencies and other data suppliers who may record any credit searches on your file.

User Access and Control

Controlling direct marketing

You can change your mind about receiving direct marketing from us by contacting us using the contact details on the Blackthorne web site Contact page, or email info@Blackthorneinv.co.uk

You can control communications such as bulletins and other information about your chosen services by following the unsubscribe instructions in the communication or by simply replying and inserting "Unsubscribe" in the subject line. You may still receive other communications that are relevant to your chosen services but do not relate to that specific type of communication. Where this is the case, you will be able to unsubscribe from these communications in the same way.

Requesting copies of your personal information

You may request a copy of your personal information from Blackthorne, which Blackthorne may hold about you without charge. You can also ask us to correct any inaccuracies in your personal information (which is also free).

Retention of personal information

We will retain your information for as long as necessary for the uses set out in this Policy. Personal information that is not or no longer pertinent to us will be erased or shredded as per our Data Retention Policy in Annex 1 below. If you ask us to delete your information before that time, we may not be able to do so, due to technical, legal, regulatory and contractual constraints but we will endeavor to meet your request.

PART B. COOKIE POLICY

Introduction

This Policy covers our use of cookies, IP addresses, and other technologies.

What are Cookies?

Cookies and other online tracking technologies are small bits of data or code that are used to identify your devices when you use and interact with our website and other services. They are often used for remembering your preferences, to identify popular web site or apps pages.

What Cookies do we use and how do we use them?

Essential cookies and similar technologies

These are vital for the running of our services on our website and apps. Without the use of these cookies parts of our website would not function. For example, the use of cookies may help us identify the location and or authenticity of a client and protect Palatine from misuse, malice or fraud.

Analytics cookies and similar technologies

These collect information about your use of our website and apps, and enable us to improve the way it works. For example, analytics cookies show us which are the most frequently visited pages on the website allowing us to provide the most popular news articles further up the page. They help us record how you interact with our website, such as how you navigate around pages and from page to page; identifying improvements we can make to the visitor's journey. They also help identify any difficulties you have accessing our services, so we can fix any problems. Additionally these cookies allow us to see overall patterns of usage at an aggregated level.

Functional/preference cookies and similar technologies

These cookies collect information about your choices and preferences, and allow us to remember things like language, your username (so you can log in faster), text size, and location, so we can show you relevant content to where you are. They allow us to customize the pages, products or services you have accessed.

Tracking, advertising cookies and similar technologies

These types of technologies provide advertisements that are more relevant to visitor's interests. This can be done by delivering online adverts based on their previous web browsing activity, known as "online behavioral advertising" (OBA). Cookies are placed on their browser, which will remember the websites they have visited. Advertising based on what they have been looking at is then displayed to them when they visit websites who use the same advertising networks. Palatine does not use such technology.

Web beacons

These are bits of data that count the number of users who access a website or webpage and can also allow us to see if a cookie has been activated. Web beacons used on web pages or in emails allow us to see how successful an article has been or that an email message was successfully delivered and read in a marketing campaign or newsletter. Web beacons are also used to verify any clicks through to links or advertisements contained in emails. We may use this information to help us identify which emails are more interesting to you and to inform advertisers how many customers have clicked on their adverts (this information is aggregated and does not identify you individually).

Flash cookies

We may, in certain situations, use Adobe Flash Player to deliver special content, such as video clips or animation. To improve your user experience, Local Shared Objects (commonly known as Flash cookies) are used to provide functions such as remembering your settings and preferences. Flash cookies are stored on your device, but they are managed through an interface different from the one provided by your web browser.

Tracking URLs

Tracking URLs are a special web link that allows us to measure when a link is clicked on. They are used to help us measure the effectiveness of campaigns and advertising and the popularity of articles that are read.

We also use cookies and similar technologies:

When you access and interact with our services cookies may collect certain information about those visits. For example, in order to permit your connection to our website, our servers receive and record information about your computer, device, and browser, including potentially your IP address, browser type, other software or hardware information, and your geographic location.

If you access our services from a mobile device

We may collect a unique device identifier assigned to that device, geo-location data, and other transactional information for that device.

Usage of services

To collect, use and store information about your usage of our services, website and apps, such as pages you have visited, content you have viewed, search queries you have run, and advertisements you have seen or interacted with.

To provide relevant content

The content on our website and in our communications with you may be adjusted depending on what we know about the content, products and services that you like. This means we can highlight content and articles that we believe will be of interest to you. We provide personalisation by using cookies, IP addresses, web beacons, URL tracking and mobile app settings.

Third party advertisers

We may sell space on our website to advertisers. The adverts they display on our website will often contain cookies. Our advertisers may use cookies or similar technologies to provide you with advertisements that they believe are relevant. They may use browsing data obtained to restrict the number of times you see particular adverts (frequency capping). You may also see adverts from these advertisers on other websites you visit.

Third parties that support our services by serving advertisements or providing other services, such as allowing you to share content or tracking aggregate service usage, may also use cookies and other technologies to collect information relevant to the provision of those services.

We do not control third-party cookies or other technologies. Their use is governed by the privacy policies of third parties using such technologies. You should make sure you are aware of how third parties will use cookies by checking the third party's cookie policy.

Mobile applications

By downloading our apps, we will require access to the following services on your device: unique identifier (UDID), MAC address or other applicable device identifier and location. Other services may also be required in order for the apps to function. We may use this information to validate free trials. Our apps may also provide push notifications to your device. You may control these through using the tools on your device, such as turning off push notification and location services.

Managing cookies

Most modern browsers are set to accept cookies by default, but you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser.

Controlling OBA cookies

The "Your Online Choices" website <http://www.youronlinechoices.com> provides more information about controlling cookies. It also provides an easy way to opt out of behavioral advertising from each (or all) of the networks represented by the European Interactive Digital Advertising Alliance <http://www.youronlinechoices.com/uk/your-ad-choices>.

Controlling Flash cookies

You can manage the use of Flash technologies with the Flash management tools available at Adobe's website, at <http://www.adobe.com/devnet/flashplayer/articles/privacy.html>.

Controlling web beacons

You can prevent web beacons from tracking your activity, although you won't be able to decline receiving them in emails. For information about managing your cookie options, please click here. <http://www.allaboutcookies.org/>.

Please note that by blocking any or all cookies you may not have access to certain features, content, or personalisation available on our website, or apps.

**This is the Data Retention Policy of
Blackthorne Legal Support Services Limited T/A Blackthorne
Frodingham House, 64 Grove Road, Millhouses, Sheffield, South Yorkshire, S7 2GZ
“Blackthorne”**

1. We do not keep data for longer than necessary.

2. We will keep securely a record of all received cases by date, Client name, subject name and information requested for a maximum of 6 years unless instructed by the client to do otherwise.
If it is electronic data then it is erased or if it is a hard copy then it is shredded.
This will not include any other data such as subject address or information supplied.

3. If the case is a trace and if it's a “positive” trace then we will keep securely a copy of the instruction from our client and a copy of our encrypted emailed report to our client for a minimum of 6 months unless instructed by the client to do otherwise.
If it is electronic data then it is erased or if it is a hard copy then it is shredded.

4. If the case is a trace and it's a “negative” trace then we will keep securely a copy of the instruction from our client and a copy of our report to the client for a minimum of 3 months unless instructed by the client to do otherwise.
If it is electronic data then it is erased or if it is a hard copy then it is shredded.

5. If the case is a due diligence report (or any such similar report) then we will keep securely a copy of the instruction from our client and a copy of our encrypted emailed report to our client for a minimum of 6 months unless instructed by the client to do otherwise.
If it is electronic data then it is erased or if it is a hard copy then it is shredded.

6. If the case is a Process serving matter then we will keep securely a copy of the instruction from our client and a copy of our report (or our witness statement) for a minimum of 6 years unless instructed by the client to do otherwise.
If it is electronic data then it is erased or if it is a hard copy then it is shredded.

Dated: 25/05/2018