

# PRIVACY AND COOKIES NOTICE

## 1. Introduction

This Privacy Notice explains how **Jovian&Co Limited** collects, uses, stores and protects personal data, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Jovian&Co Limited is a **data controller** for the purposes of data protection law. This means we are responsible for deciding how and why we process your personal data.

We may update this Privacy Notice from time to time to reflect changes in law or our practices. The most recent version will always be available on our website or upon request.

Where we act as a **data processor** on behalf of another organisation (for example, where we process data strictly on a client's instructions), additional data protection terms will apply and should be read together with this notice.

## 2. Our Contact Details

### **Jovian&Co Limited**

Address: 17a Electric Lane, London, SW9 8LA

Telephone: 020 6581 6025

Email: [info@joviannco.com](mailto:info@joviannco.com)

Website: [www.joviannco.com](http://www.joviannco.com)

## 3. Purposes for Which We Process Personal Data

We process personal data for one or more of the following purposes:

- To provide professional and business services to you
- To manage and administer our relationship with you
- To comply with applicable legal, regulatory and professional obligations
- To prevent fraud and financial crime and to carry out identity checks where required
- To maintain internal records and accounts
- To invoice you for our services and manage payments or resolve fee-related queries
- To investigate, establish, exercise or defend legal claims or complaints
- To communicate with you about our services, including responding to enquiries
- To send you information about our services where you have consented to receive such communications

## 4. Legal Bases for Processing

We process your personal data on one or more of the following legal bases:

- **Contract** – processing is necessary for the performance of a contract with you or to take steps at your request before entering into a contract

- **Legal obligation** – processing is necessary for compliance with a legal or regulatory obligation
- **Legitimate interests** – processing is necessary for our legitimate business interests, such as managing our business, preventing fraud, or defending legal claims, provided those interests are not overridden by your rights
- **Consent** – where you have given clear consent for us to process your personal data for a specific purpose (for example, marketing communications)

Where consent is relied upon, you may withdraw it at any time (see section 11 below).

If you do not provide personal data that we reasonably require, we may be unable to provide our services to you or may need to stop acting for you.

## 5. Categories and Sources of Personal Data

We may process the following categories of personal data:

- Identification and contact details (such as name, address, email address, telephone number)
- Business-related information
- Financial and payment information
- Correspondence and communications
- Any other personal data you provide to us in the course of our relationship

We usually collect personal data directly from you. In some cases, we may receive personal data from third parties or publicly available sources, where lawful to do so.

## 6. Sharing Personal Data

We may share your personal data with:

- Third parties you have authorised us to deal with
- Professional advisers, consultants or subcontractors who support our business
- Insurers and professional indemnity providers
- Regulatory, supervisory or law enforcement authorities where required or permitted by law
- Courts, tribunals and dispute resolution bodies

We only share personal data where it is necessary, lawful and proportionate to do so. If you ask us not to share data where sharing is required for legal or contractual reasons, we may be unable to continue providing services.

## 7. International Transfers

We do not normally transfer personal data outside the United Kingdom or the European Economic Area (EEA). Where any international transfer is required, we will ensure appropriate safeguards are in place in accordance with data protection law.

## 8. Retention of Personal Data

We retain personal data only for as long as necessary for the purposes for which it was collected, including to meet legal, regulatory, contractual and business requirements.

Retention periods vary depending on the nature of the data and our relationship with you. In general:

- Client and contractual records are retained for up to **six years** after the end of the business relationship
- Financial and transactional records are retained in line with statutory requirements

Once retention periods expire, personal data is securely deleted or destroyed.

Where we act as a data processor, we will delete or return personal data to the data controller in accordance with our agreement.

## 9. Your Data Protection Rights

You have the following rights under data protection law:

- **Right of access** – to request a copy of the personal data we hold about you
- **Right to rectification** – to request correction of inaccurate or incomplete data
- **Right to erasure** – to request deletion of your personal data in certain circumstances
- **Right to restrict processing** – to request that processing is limited in certain circumstances
- **Right to object** – to object to processing based on legitimate interests or direct marketing
- **Right to data portability** – to receive certain data in a machine-readable format

Requests should be made in writing using the contact details above. We may ask for proof of identity before responding. We will respond within one month, unless an extension is permitted by law.

## 10. Automated Decision-Making

We do not use automated decision-making or profiling that produces legal or similarly significant effects for individuals.

## 11. Withdrawal of Consent

Where processing is based on consent, you may withdraw that consent at any time by contacting us. Withdrawal will not affect the lawfulness of processing carried out before consent was withdrawn.

## 12. Complaints

If you are concerned about how we handle your personal data, please contact us in the first instance using the details above.

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, the UK's data protection authority ([www.ico.org.uk](http://www.ico.org.uk)).

## 13. COOKIES NOTICE

### 13.1 What Are Cookies?

Cookies are small text files that are placed on your device when you visit a website. They are widely used to make websites work efficiently, improve user experience, and provide information to website owners.

### 13.2 How We Use Cookies

Our website, [www.joviannco.com](http://www.joviannco.com), may use cookies to:

- Ensure the website functions correctly
- Improve website performance and security
- Understand how visitors use our website so we can improve it

We do not use cookies to collect information that directly identifies you unless you choose to provide such information.

### 13.3 Types of Cookies We May Use

- **Strictly necessary cookies** – required for the operation of our website
- **Analytical or performance cookies** – help us understand how visitors interact with our website (for example, pages visited and traffic sources)
- **Functionality cookies** – enable the website to remember choices you make and provide enhanced features

### 13.4 Managing Cookies

You can control and manage cookies through your browser settings. You may delete existing cookies and block future cookies, although doing so may affect the functionality of our website.

For more information about cookies and how to manage them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### 13.5 Changes to This Cookies Notice

We may update this Cookies Notice from time to time to reflect changes in technology, law, or our practices. Any updates will be posted on our website.