Turley Privacy Notice for Clients

Edition Date: November 2026

1 What is the purpose of this document?

Turley Associates Limited ("**we**", "**our**", "**us**", "**Turley**") is committed to protecting the privacy and security of our clients' personal information. This privacy notice describes how we collect and use personal information about you/your organisation, in accordance with data protection and privacy laws applicable to Turley (including, as applicable: the Data Protection Act 2018, UK General Data Protection Regulation ("**UK GDPR**"), and the General Data Protection Regulation (EU) 2016/679 ("**EU GDPR**"), in each case as amended from time to time).

Turley is a "data controller". This means that we are responsible for deciding how we hold and use personal information about our clients ("**you**", "**your**"). We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. These other applicable privacy notices include for example our website privacy notice.

Turley is a private limited company, with registered company number 02235387, and our registered office is situated at Level 5 Transmission, 6 Atherton Street, St John's Enterprise City, Manchester, United Kingdom, M3 3GS.

2 The kind of information we hold about you

We may collect, store, and use the following categories of personal information about you:

- Contact details such as name, title, addresses, telephone numbers and email addresses.
- Organisation details and job title (if you are a business client).
- Payment details.
- History of previous instructions.
- Information about our clients' use of our information and communications systems.
- Images (photo/video).
- Any personal and professional interests you may have.

We typically collect personal information about you when you procure services from us including via email or telephone or if you attend an event. We may also collect additional personal information throughout the period of us providing services to you or your organisation, for example when you search on our website, subscribe to our services or when we correspond with you.

3 How we will use information about you

We will use your personal information as follows:

- To administer or otherwise carry out our obligations arising from any contracts entered into with you/your organisation or to take steps to enter into any contracts between you/your organisation and us.
- To provide you with the information, products and services that you request from us and to provide client service.

- To fulfil any requests or instructions you have made, or to contact you with information relevant to your interaction with us.

- To maintain and update our client databases.

Our lawful basis for the activities above is necessity to perform our contract of sale with you/your organisation.

- To ascertain your ability to pay us for the services we may provide to you.

- For audit purposes.

- For fraud monitoring and prevention.

Our lawful basis for the activities above is the pursuit of our legitimate interests of operating and expanding our business activities lawfully.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or your organisation (such as providing the services to you). In limited circumstances, we may rely on "recognised legitimate interests" under UK GDPR to process your personal data (for example, in connection with regulatory compliance, to respond to an emergency, or the prevention of unlawful activities). Where we do so, we will ensure the processing is necessary and proportionate.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

4 Data sharing

We may have to share your data with third parties, including third-party service providers such as IT providers and payment providers. We may sometimes be obliged to disclose your personal information by law such as by a regulator with appropriate power or court order or to otherwise comply with the law. Potential recipients include HM Revenue & Customs. We may also need to share your data with other professional advisors, auditors, counterparties and consultants to fulfil our professional obligations, or where you ask us to share your data.

All our third-party partners/service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party partners/service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

5 Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you/your organisation is no longer a client of ours, we will securely destroy your personal information in accordance with our

data retention procedures unless legal obligations require us to store your personal data for longer. Please contact us if you have any questions regarding our data retention procedures.

6 Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained on request. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7 Data Transfers

In the course of carrying out the activities referred to above we may transfer your personal information to countries outside the UK, including to our office in Dublin

Where personal information is being transferred outside of the UK, we will take steps to ensure that your data is adequately protected in accordance with Data Protection Act 2018, the UK GDPR and, if applicable, the EU GDPR. There are adequacy regulations in place in respect of Ireland. This means that Ireland is deemed to provide an adequate level of protection for your personal information.

Other than as set out above not transfer any of the personal information you provide to us outside of the UK.

8 Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request** access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes (for example, email marketing or phone calls).

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this

right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact alison.browne@turley.co.uk or carol.maughan@turley.co.uk in writing and they will explain any conditions that may apply.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact alison.browne@turley.co.uk or carol.maughan@turley.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Further guidance on your rights is available from the Information Commission (https://.ico.org.uk/). You have the right to complain to the UK's supervisory office for data protection, the Information Commission, at https://ico.org.uk/concerns/ if you believe that your data has been processed unlawfully. However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The Information Commission will expect you to have done this before reviewing your complaint. Please contact the Turley IT team (itservicedesk@turley.co.uk) if you would like to raise a concern or ask us for clarification.

9 Changes to this Privacy Notice

Alison Browne and Carol Maughan have been appointed to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact alison.browne@turley.co.uk or carol.maughan@turley.co.uk.

We reserve the right to update this privacy notice at any time for example if the law or regulatory requirements change, if technology changes or to make Turley's operations and procedures more efficient. We will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.