

## Privacy Notice - Updated: February 25, 2020

Larrabee Albi Coker LLP ("**LAC**", "**we**", "**us**", "**our**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. It applies to all individuals who access our website at [www.larrabee.com](http://www.larrabee.com) ("**Website**") or engage our legal services ("**Services**"), although some parts are relevant only to individuals located in the European Economic Area ("**EEA**"). We recommend that you read this Privacy Notice in full to ensure you are fully informed.

### What does LAC do?

Larrabee Albi Coker LLP provides our clients clear, accurate, and timely legal guidance that supports their business hiring decisions or individual immigration needs. We are able to anticipate potential problems and gaps in the process, thereby building and maintaining the immigration bridge between a business' goals and employees' needs. For more information about LAC and the legal services we provide, please see the "What We Do" section of our Website at [www.larrabee.com/what-we-do/](http://www.larrabee.com/what-we-do/).

### What personal information does LAC collect when you visit our Website and why?

The personal information that we may collect about you when you visit our Website broadly falls into the following categories:

#### Information that you provide voluntarily

We collect personal information that you provide voluntarily through our Website, for example when completing online forms to contact us or register for events that we are organising. The information we collect about you may include some or all of the following:

- Name and job title;
- Company or organisation;
- Contact information, including email address and telephone number(s);
- Information pertinent to fulfilling our Services to you; and
- Any other personal information that you voluntarily choose to provide to us.

If we ask you to provide any other personal information not described above, the personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point that you are asked to provide your personal information.

### Information that we collect automatically

When you visit our Website, we may collect certain personal information automatically from your device.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification number, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further in our [Cookie Notice](#).

### **What personal information does LAC collect when you engage our Services and why?**

When you engage us to provide you with legal Services, we collect and use personal information which is necessary for the performance of those Services.

The majority of the personal information we collect and use to provide our Services is supplied voluntarily by our clients or from third parties such as their sponsoring employer. Because of this, if you are a client of LAC then it will generally be obvious to you what personal information we collect and use. This information may include:

- Basic information such as your name, the company you work for, your position and your relationship to other individuals related to your legal queries;
- Contact information such as your postal address, email address and telephone number(s);
- Financial information, such as payment related information;
- Identification and background information provided by you or collected as part of our business acceptance process;

- Special categories of personal information, such as information about a person's racial or ethnic origin, political associations, biometrics, religious or philosophical beliefs, marriage status (indicating sexual orientation), physical or mental health, alleged criminal activities, or similar where this is necessary in connection with the Services we provide; and
- Any other personal information relating to you or other third parties which you may provide to us for the purpose of receiving our Services such as job description, work and education history, family members, previous immigration applications and visas, salary and benefits information and references.

We use this information to facilitate the provision of our Services to you, the client. In addition, we will process identification and background information as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, reputational and financial checks, and to fulfil any other legal or regulatory requirements to which we may be subject. The information our clients provide may be disclosed to third parties to the extent that is reasonably necessary in connection with that work (for example, when seeking advice from external counsel or experts or when communicating with government agencies as part of the Services we provide to you).

### **Collection and Use of Non-Personal Information**

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. We may collect information such as country of birth, application type, approximate income or similar general information for our own general assessment or to better understand trends.

If we do combine non-personal information with personal information, the combined information will be treated as personal information for as long as it remains combined.

### **When and with whom might LAC share your personal information?**

We may disclose your personal information to the following categories of recipients:

- to your sponsoring employer, government body, or a relative, but only where we have checked that we either have your consent or are otherwise legally permitted or required to disclose your personal information to them, and in accordance with the separate notice we provide as part of client onboarding (see Appendix A – Joint Representation and Conflicts Waiver);
- to our partner immigration law firms overseas to assist with your outbound application;

- to our third-party services providers and partners who provide data processing services to us such as LAN Solutions (manages our IT services), LawLogix (our case management program) and Trustforte (an academic evaluation service);
- to any competent law enforcement body, regulator, government agency, court or other third party where we believe disclosure is necessary: (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice; and
- to a person you have given us your consent to disclose to.

### **How does LAC keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you and only use suppliers who guarantee the same. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

### **Data retention**

We will retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). For example, once we have achieved the desired immigration objective, and we close your file with our office, our typical period for retention is seven (7) years from the date the file is closed.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **Additional information for individuals located in the EEA**

#### Legal basis

If you are located in the EEA, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you (for example, when providing our Services), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to process personal information about you, or may need to process personal information in order to exercise, establish or defend legal claims.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences, if any, if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information (including any legitimate interests relied upon), please contact us.

#### International data transfers

Our Website servers are located in the United States as are the service providers we use. This means that when you provide us with your information, it will be processed in the United States, where data protection laws may vary compared to the laws of your country. Certain applications require us to send your personal information to embassies overseas, typically to your country of origin, which could be located anywhere in the world. We will only transfer the amount of information required to complete your application.

When you provide your personal information, you should transfer to us only where necessary for the performance of our contract with you, or a contract with your sponsoring employer, for the provision of our Services. Alternatively, we may seek your explicit consent for the transfer, which you will be informed of at the time.

#### **Your data protection rights**

Depending on where you are located, you may have some or all of the following data protection rights, which you can request by contacting us using the contact details below:

- The right to access, correct, update or request deletion of your personal information.
- The right to object to the processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.

- The right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- The right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area are available [here](#).)

We respond to all requests received from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### **Updates to this Privacy Notice**

We may update this Privacy Notice from time to time in response to legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, which will be consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

### **How to contact us**

The data controller of your personal information is Larrabee Albi Coker LLP. If you have any questions or concerns about our use of your personal information, please contact us at:

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