

Privacy Policy

Delvendahl Martin LLP (“Delvendahl Martin LLP”) has created this privacy policy in order to demonstrate our commitment to privacy.

Delvendahl Martin LLP respects individual privacy and strives to collect, use and disclose Personal Data in a manner consistent with the laws of the countries in which it does business, and prides itself on upholding the highest ethical standards in its business practices. Delvendahl Martin LLP has the need to process the human resource data of current and former employees, as well as job applicants of Delvendahl Martin LLP. From time to time, Delvendahl Martin LLP may also receive human resource data of its clients.

The use of EU Personal Data will include, career development, staffing, international personal security issues, internal investigations, ethics investigations, law enforcement inquiries, disaster recovery and business continuity efforts, and performing services required by contract.

Background

The EU adopted the Directive on Data Protection (“EU Directive”), which requires EU member states to adopt laws protecting Personal Data collected or processed within their borders. These laws must, among other provisions, restrict the transfer of Personal Data only to countries that have data protection laws deemed “adequate” under standards established in the EU Directive.

Definitions

Identifiable Person means a natural person that is or can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person’s physical, physiological, mental, economic, cultural or social identity. Identifiable Persons may include any employee, applicant, former employee, or retiree of Delvendahl Martin LLP or of its clients.

Personal Data is any information about an Identifiable Person that

- is within the scope of the EU Directive,
- is recorded in any form and
- is about, or pertains to, a specific individual; and can be linked to that individual.

Personal Data does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public Personal Data.

Processing means any online or offline, manual or automatic processing and includes such activities as copying, filing, and inputting Personal Data into a database.

Sensitive Data is data that pertains to medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or sexual orientation. We will also treat as Sensitive Data any information received from a third-party the third-party treats and identifies as sensitive data.

Publication

This Privacy Policy will be published on Delvendahl Martin LLP’s website (available at [www.Delvendahl Martin LLP.com](http://www.DelvendahlMartinLLP.com)) and on the Studio’s server.

Guidelines

1. Notice.

Where Delvendahl Martin LLP collects Personal Data directly from Identifiable Persons in the EU, it will inform such persons about the type of Personal Data collected, the purposes for which it collects and uses the Personal Data, the types of non-agent third parties to which Delvendahl Martin LLP discloses or may disclose that information, and the choices and means, if any, Delvendahl Martin LLP offers individuals for limiting the use and disclosure of their Personal Data. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Data to Delvendahl Martin LLP, or as soon as practicable thereafter, and in any event before Delvendahl Martin LLP uses or discloses the information for a purpose other than that for which it was originally collected.

To the extent practical and appropriate, Delvendahl Martin LLP collects Personal Data directly from the Identifiable Person. In those cases where Delvendahl Martin LLP collects Personal Data from other persons, it takes measures to respect the privacy preferences of the Identifiable Persons. Examples of when Delvendahl Martin LLP may seek information from others include, without limitation, evaluating employees, recruiting and benefit administration.

Delvendahl Martin LLP's collection and use of Personal Data in the employment context is essential to the conduct of Delvendahl Martin LLP's human resources and business functions. Examples of the purposes for which Delvendahl Martin LLP collects and uses Personal Data include, without limitation, recruitment, payroll, and personnel management, such as compensation, promotion, evaluation and benefit administration.

While recognizing that all Personal Data deserves to be protected, Delvendahl Martin LLP exercises special precautions and safeguards for Sensitive Data.

2. Choice.

Opt-Out Rights.

Delvendahl Martin LLP will offer Identifiable Person(s) the opportunity to choose (opt-out) whether their Personal Data is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. In addition, where consent of Identifiable Persons or their representatives is required by law, contract, or agreement for the collection, use, or disclosure of Personal Data, Delvendahl Martin LLP will request such consent and respect the Identifiable Person's choice in such matters.

In certain limited or exceptional circumstances, Delvendahl Martin LLP may disclose Personal Data without notice or the consent of the Identifiable Person. For example, this may occur when Delvendahl Martin LLP is required to disclose information by law or legal process or in the vital interests of the Identifiable Person, such as when life or health are at stake.

Opt-In Requirement.

Except as provided by the Safe Harbor Principles or applicable law, an Identifiable Person must give affirmative permission (opt-in consent) before Delvendahl Martin LLP will disclose Sensitive Data to a third party or use Sensitive Data for a purpose other than those for which it was originally collected or subsequently authorized by the Identifiable Person.

Delvendahl Martin LLP will provide Identifiable Persons with reasonable mechanisms to exercise their choices.

3. Onward Transfer

To enable Delvendahl Martin LLP to provide employees with certain services such as payroll direct deposit, personnel benefits, or other human resource services, Delvendahl Martin LLP may disclose Personal Data without consent to sub-contractors, vendors or other third parties, if the third party (i) is subject to laws meeting the minimum standards required by the EU Directive or (ii) enters into an agreement with Delvendahl Martin LLP obligating the third party to provide at least the same level of privacy protection.

4. Security

Delvendahl Martin LLP takes reasonable precautions to protect Personal Data against loss, misuse and unauthorized access, disclosure, alteration, destruction and theft.

These precautions include password protections for online information systems and restricted access to Personal Data. All inquiries from outside Delvendahl Martin LLP, whether written or oral, concerning the identity, employment record or performance of an employee or former employee must be referred to the Studio Manager.

Employees are responsible for helping maintain security through safeguarding Personal Data, e.g., by protecting passwords used to access Delvendahl Martin LLP computer systems, by keeping paper records under lock and key when not in use, and by disposing of files and reports no longer needed in a secure manner.

5. Data Integrity

Delvendahl Martin LLP takes reasonable steps to keep Personal Data relevant and reliable for the purposes for which it is to be used, accurate, complete, and up-to-date. Each Identifiable Person is responsible for informing Delvendahl Martin LLP of any changes in Personal Data so that the information that Delvendahl Martin LLP holds about him or her is relevant and reliable for the purposes for which it is to be used, accurate, complete and up-to-date.

Delvendahl Martin LLP retains Personal Data only as long as necessary to meet the purposes for which it was collected or as required by law and contractual agreement.

Certain Personal Data may be archived to administer post-employment benefits, to meet legal requirements, to provide evidence in cases of litigation, for statistical purposes, or to assist in decision relating to re-employment.

Delvendahl Martin LLP uses reasonable procedures, following retention guidelines, to ensure that it archives or destroys Personal Data no longer required for the purposes for which it was originally collected, unless otherwise agreed to by the Identifiable Person.

6. Access

Delvendahl Martin LLP provides Identifiable Persons with a reasonable opportunity to examine their Personal Data, to challenge its accuracy and to have it corrected, amended or deleted as appropriate, subject to certain exceptions as set out below. Upon request, Identifiable Persons will be given reasonable access to the Personal Data Delvendahl Martin LLP holds about them. Reasonable access means that requests for access are made during normal business hours, following standard procedures, and that the frequency of access requests is not excessive.

If an Identifiable Person is denied access to Personal Data, Delvendahl Martin LLP will provide such Identifiable Person with the reason(s) for denying access and a contact point for further inquiries.

If the Identifiable Person notifies Delvendahl Martin LLP that the Personal Data on file is incorrect and provides Delvendahl Martin LLP with appropriate supporting documentation, Delvendahl Martin LLP will either correct the Personal Data or direct the Identifiable Person to the source of the information for correction.

If, upon review, Delvendahl Martin LLP believes that the existing Personal Data is correct, Delvendahl Martin LLP will inform the Identifiable Person. If the Identifiable Person continues to dispute the accuracy of the Personal Data, Delvendahl Martin LLP will note that dispute in the record of the Identifiable Person upon written request.

In addition, access may be denied

- when the information requested relates to an ongoing investigation, litigation or potential litigation,
- where the burden or expense of providing access would be disproportionate to the risks to the privacy of the Identifiable Person or
- when the rights of persons other than the Identifiable Person would be violated.

7. Enforcement and Dispute Resolution

Identifiable Persons may contact the Delvendahl Martin LLP Studio Manager to submit data access requests, register complaints or address any other relevant issues under EU Directive. It is the responsibility of all employees to act in accordance with the Privacy Policy and obligations with respect to Personal Data. Failure to do so may result in disciplinary action, if warranted, up to and including termination of employment.

Delvendahl Martin LLP is committed to assisting Identifiable Persons in protecting their privacy and in exercising their rights under this Privacy Policy and applicable laws. Identifiable Persons making complaints or reporting potential violations of the Privacy Policy shall not be subject to any form of retaliation. In addition, report of potential violations may be made on an anonymous basis.

For complaints that cannot be resolved between Delvendahl Martin LLP and the complainant, Delvendahl Martin LLP has agreed to cooperate with the European Data Protection Authorities.

Verification

The Delvendahl Martin LLP Studio Manager is responsible for:

- Ensuring that the privacy guidelines, programs, procedures, training and other measures necessary to implement the Privacy Policy are developed and put into practice;
- Overseeing responses to inquiries and resolutions of complaints relating to the privacy of Identifiable Persons;
- Working with Delvendahl Martin LLP's legal department to ensure Delvendahl Martin LLP's ongoing compliance with applicable privacy laws and agreements, as well as any obligations Delvendahl Martin LLP may enter into voluntarily, and
- Overseeing annual assessments of Delvendahl Martin LLP internal practices to ensure that they conform to the Privacy Policy and related company obligations.

Inquiries with respect to this Privacy Policy may be directed to the Delvendahl Martin LLP Studio Manager.

This Privacy Policy may be amended from time to time consistent with the requirements of the EU Directive. Notices of such changes will appear on dm-architects.co.uk and on the studio's server.