

# Privacy Policy

Allen & Overy values your privacy and cares about the way in which your personal information is treated.

This policy describes:

1. what personal information we collect about you
2. how we obtain your personal information
3. how and on what basis we use your personal information
4. how long we keep your personal information
5. who we share your personal information with
6. how we protect your personal information
7. which countries we transfer your personal information to
8. your rights regarding your personal information
9. who are the data controllers
10. changes to our privacy policy
11. who to contact with questions or concerns

Allen & Overy refers to Allen & Overy LLP, its subsidiaries and other partnerships, corporations, undertakings and entities which are authorised to practice using the name 'Allen & Overy'. See the section entitled 'Who are the **data controllers**' below for more information on the entity that controls and processes personal data.

## 1. What personal information do we collect about you?

In this privacy policy, we use the term personal information to describe information that is about you and which identifies you.

In relation to your use of the Hong Kong Cyber Fraud First Response Tool (the **Tool**), including where you are using the Tool on an individual's behalf and at their request, we will collect the following personal information:

- Basic information about you (your name (including name prefix or title) and the company that you work for)
- Contact information (your postal address, email address and telephone and fax number(s))
- The country you are located in
- Any other information relating to you (or other individuals) which you may provide to us, or which is otherwise provided to us or generated by us, in the course of your use of, or the operation of, the Tool, including the bank account number, and the name of the bank with whom the relevant account is with, impacted by any incident to which your use of the Tool relates

If your bank uses the Tool on your behalf and at your request, we will collect the following personal information about you:

- Your name (including name prefix or title)
- Contact information (your postal address and telephone and fax number(s))
- Any other information relating to you which is otherwise provided to us or generated by us in the course of your bank's use of, or the operation of, the Tool, including the name of your bank and your bank account number impacted by any incident to which the use of the Tool relates

You are responsible for ensuring that the personal information you provide to us complies with applicable data protection laws and you will not do or omit to do anything that would cause Allen & Overy to be in breach of those laws.

## 2. How we obtain your personal information

We collect personal information:

- directly from you in the course of your use of the Tool, including all information that you submit through the Tool
- from your bank where they use the Tool on your behalf and at your request

## 3. How and on what basis we use your personal information

We have set out below the purposes for which we use your personal information and the legal basis (as set out in the GDPR) that we rely on to process your information.

Purpose	Legal Basis
To generate draft documentation to assist you with reporting potential financial fraud	<p>For the performance of a contract with you in relation to your use of the Tool</p> <p>For our legitimate business purposes, including enabling the use of the Tool by your bank at your request and with your permission to assist you with reporting potential financial fraud</p>
To compile anonymous statistics about individual users of the Tool	<p>For our legitimate business purposes (to provide and improve the Tool and other services of Allen &amp; Overy and inform marketing activities in relation to the Tool and other services of Allen &amp; Overy)</p>

<p>To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims</p>	<p>For our legitimate business purposes (such as establishing, exercising or defending legal claims) and for compliance with legal obligations to which we are subject</p>
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**4. How long we keep your personal information**

Save as set out below, the information submitted to the Hong Kong Cyber Fraud First Response Tool will be retained for the duration of an individual’s use of the Tool and will be deleted when the individual closes the Tool.

We will retain non-personal information about the country location of where the Hong Kong Cyber Fraud First Response Tool is being used and the total monetary value of the fraud. Individuals will not be identifiable from this information.

**5. Who we share your personal information with**

Subject to the above, we are an international business and any information that you provide to us may be shared with and processed by any entity in the worldwide network of Allen & Overy and our associated firms. You can see a list of our offices at <http://www.allenoverly.com/locations/>. The non-personal information relating to the country in which the Tool is being used and the monetary value of the fraud will be shared with Allen & Overy (Hong Kong).

We may also share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including IT and other service providers to Allen & Overy. The Hong Kong Cyber Fraud First Response Tool is powered by our service provider Microsoft. When we engage a third party service provider to collect or otherwise process personal information on our behalf, the third party is selected carefully and will be required to have appropriate security measures in place.

Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new Allen & Overy entities or to third parties through which the business of Allen & Overy will be carried out.

If you separately access [www.allenoverly.com](http://www.allenoverly.com) or use our legal services, we will process your information as set out in the privacy policy on the website, which is available by clicking [here](#) or via <https://www.allenoverly.com/en-gb/global/legal-notice/privacy-policy>.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

## **6. How we protect your personal information**

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

The information processed in the Hong Kong Cyber Fraud First Response Tool is encrypted in transit (HTTPS/TLS 1.2) and at rest (AES-256). As set out above, Microsoft powers the Tool and its information security policies are aligned with the ISO 27001 standard. Microsoft conducts regular automated penetration scanning, network vulnerability assessments, internal audits and annual penetration testing of its systems.

## **7. Which countries we transfer your personal information to**

The Hong Kong Cyber Fraud First Response Tool is hosted in the European Economic Area (the “EEA”). Your data will also be processed in the country in which you, or your bank acting on your behalf, are accessing the Tool.

In order to provide services using the Hong Kong Cyber Fraud First Response Tool, we may need to transfer your personal information to locations outside the EEA or the jurisdiction in which you provide the information for the purposes set out in this privacy policy. Please see **‘Who we share your personal information with’** for more detail on how the information may be shared with Allen & Overy offices and third party service providers.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. EU standard contractual clauses (as contemplated by Article 46(2) of the GDPR) are in place between all Allen & Overy entities that share and process personal data. Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses.

Please contact us using the details at the end of this privacy notice if you would like to see a copy of the safeguards applied to the export of your personal data.

## **8. Your rights regarding your personal information**

The GDPR and other applicable data protection laws provide certain rights for data subjects.

You are entitled to request a copy of the information we hold about you and information about how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict or suspend our processing of that information, to object to our processing of your information and, in some circumstances,

to request receipt or transmission to another organisation, in a machine-readable form, personal information relating to you that you have provided to us. You also have the right to lodge a complaint in relation to Allen & Overy's processing of your personal information with a local supervisory authority.

If you object to the processing of your personal information we will respect that choice in accordance with our legal obligations.

## **9. Who are the data controllers**

There are a number of entities through which Allen & Overy provides legal services. Most of the firm's main IT systems are located in the UK and controlled by Allen & Overy LLP. Depending on the location where legal or other services are provided, another undertaking or entity in the Allen & Overy group may be the data controller in relation to your personal data. Please click [here](#) for details of the Allen & Overy entity through which we practise law in each jurisdiction and, where necessary having regard to local applicable data protection or privacy laws, a country-specific privacy notice.

## **10. Changes to our Privacy Policy**

This privacy policy may change from time-to-time and the updated policy will be posted on this page. The updated privacy policy will take effect as soon as it has been updated or otherwise communicated to you. The date of the last change will be indicated at the end of this document.

This privacy policy was last updated in January 2024.

## **11. Who to contact with questions or concerns**

If you have questions, complaints or need further information about our privacy policy or practices, please contact our Chief Privacy Officer, using the details below:

Chief Privacy Officer  
Allen & Overy LLP  
68 Donegall Quay  
Belfast  
Northern Ireland  
BT1 3NL  
Email: [DataPrivacy@allenoverly.com](mailto:DataPrivacy@allenoverly.com)  
Tel: +44 (0) 28 9060 7500