

Data Protection Privacy Notice

1. Introduction

- 1.1. Vasani International Arbitration Limited ("**VIA**") is a registered data controller with the Information Commissioner's Office ("**ICO**"); its registration reference number is ZB900063.
- 1.2. This Data Protection Privacy Notice (the "**DPPN**") explains how the commitment to protecting client information and privacy is achieved with the data that is used, processed, and collected when delivering legal services.
- 1.3. This DPPN addresses information and data provided for the following reasons:
 - a. when advising and acting in connection with the provision of legal services;
 - b. communications with clients and other necessary parties, organisations, and individuals; and
 - c. email updates or other marketing activities subject to consent.
- 1.4. It sets out how personal information and data is processed, with whom it may be shared, and choices you can make about use of the information collected.
- 1.5. This DPPN details the security measures which have been taken to protect personal data and information on how to enquire about these privacy practices, should you have any questions. Please read this DPPN carefully to understand the practices and processes which cover why personal information is collected, what is done with it, and how it is used.

2. Changes and Updates

- 2.1. This DPPN may change from time to time. Please review it periodically. Further information about data privacy may be found in the Terms of Business sent to all clients at the outset of their Contract.
- 2.2. The DPPN was last updated in October 2025.

3. Status

- 3.1. VIA is a data controller, and a limited company registered in England and Wales under company number 16289540.
- 3.2. Personal information is processed in accordance with data protection legislation ("**UK GDPR**").

- 3.3. Due to its organisation type and size, VIA is not required to appoint a Data Protection Officer under UK GDPR. However, VIA's Sarah Vasani should be consulted if there are any concerns or UK GDPR related matters. She will deal with these matters in her role as VIA's Founder and Director.

4. The Legal Basis on Which Your Information Is Processed

- 4.1. The legal grounds for processing data depend upon the nature of the relationship with you and the context of processing. The legal basis for processing your data will be one or more of the following:
- a. **Processing is necessary for the performance of a contract with you, or to take steps prior to concluding a contract with you.** The client contract is comprised of the client engagement letter and terms of business along with any funding agreements which you enter into such as a conditional fee agreement; these documents set out the terms of the contract and the services to be provided to you.
 - b. **Processing is necessary for the purpose of the legitimate interests of the business or those of clients in the provision of legal services.** An exception is where those interests are overridden by the interests, rights or freedoms of affected individuals. To determine this, several factors will be weighed up, including what you were told at the time you provided your data, what your reasonable expectations are, and the nature of the data as well as its impact upon you.
 - c. **Processing is necessary for compliance with mandatory legal obligations.**
 - d. In limited circumstances, processing may rely upon consent if individuals have given clear permission for us to send them useful relevant legal news and limited marketing documentation. In such circumstances, we will always require positive opt-in and use clear, plain language that is easy to understand. We keep records and make it clear that consent can be withdrawn at any time.

5. Your Personal Information

- 5.1. Personal information is collected, retained, and processed to enable accurate legal advice to be provided, to conduct arbitration proceedings and to provide legal and related business services.
- 5.2. Personal information may be collected in a variety of ways, including:
- a. in hard copy, by email, by fax or post, in person, or over the telephone;
 - b. via phone recording in connection with the delivery of services;
 - c. during dealings with you or on behalf of a client;

- d. when you input details into the website by filling in a form to register for newsletters, email updates, competitions, seminars, events, or other services;
- e. when you get in contact with queries, a record of that communication may be kept;
- f. when completing surveys for research or quality purposes, although you do not have to respond to them;
- g. from other third parties, for example agents, insurance companies, other clients or their representatives or other legal service providers;
- h. online via the website or social media accounts such as LinkedIn and Instagram;
- i. when publicly available information about you or your business is collected, including through electronic data sources, for example in connection with due diligence, anti-money laundering and credit risk reduction; or
- j. for placement, recruitment and selection purposes.

6. The Collection of Personal Information

- 6.1. The type of information collected depends upon the relationship with you and the context in which the personal data has been obtained and processed.
- 6.2. Information collected and processed may include details of the following types of information:
 - a. contact information (names, postal address, email address, telephone numbers and preferred gender identity);
 - b. occupational information, (former or current job titles, organisational associations, professional experience and qualifications, interests and preferences to provide you with relevant tailored information about such services);
 - c. payment or bank details;
 - d. next of kin and family details;
 - e. identification documents, including date of birth and photographic identification;
 - f. services in respect of which you have expressed an interest; and
 - g. other information collected and used in the course of business, including information provided by clients concerning employees of clients or those providing services to clients.

- 6.3. Where relevant, we may also process special categories of data as defined by the UK GDPR, this includes personal data that reveals:
- a. Racial or ethnic origin.
 - b. Political opinions.
 - c. Religious and philosophical beliefs.
 - d. Trade union membership.
 - e. Genetic data.
 - f. Biometric data for the purpose of uniquely identifying a natural person.
 - g. Data concerning health.
 - h. Data concerning sex life or sexual orientation.
 - i. Criminal offence data.
- 6.4. When we do process special categories of data, the legal basis will either be because it is necessary for the establishment, exercise or defence of legal matters or whenever courts are acting in their judicial capacity or because of a legal obligation.

7. The Uses of Personal Data

- 7.1. Information provided may be used for the following reasons:
- a. to make contact by email, fax, post or phone where you have provided contact details. A record may also be kept of that correspondence;
 - b. to carry out any obligations arising from contracts entered into;
 - c. to notify you about changes to services;
 - d. to improve products and services;
 - e. to maintain internal records, including about terminated contracts;
 - f. to ensure good governance, accounting, management and auditing;
 - g. to refer you to another service which may be of benefit to you;
 - h. to provide you with information, products or services which you request;
 - i. to send you information, or newsletters and legal updates which you may find of interest where you have indicated you wish to be contacted for such purposes;

- j. to pass your details to experts and other professionals for the purposes of obtaining professional advice and complying with any contractual obligations;
 - k. to contact you in the course of providing services to clients;
 - l. to assist with a recruitment and selection process;
 - m. to convert into anonymised, statistical or aggregated data which can't be used to identify you but may be used for the purposes of statistics, research reporting and future planning;
 - n. to respond to complaints;
 - o. to ensure content from the website is presented in the most effective manner; or
 - p. where there are other legitimate reasons, such as to enforce terms of use, or take other action required or permitted by law or for other safety and security reasons.
- 7.2. We will not use information for purposes that are not clear when we are provided with details. If a different legal basis to process personal data becomes necessary, we will consider whether this secondary purpose is consistent with the original purpose and contact clients if we consider this appropriate.

8. Marketing Data

- 8.1. We process personal data in order to provide appropriate information about services, seminars and events for existing and prospective clients.
- 8.2. If clients attend an event, we will only share their personal information once we have obtained prior consent.
- 8.3. We will not send out unsolicited commercial e-mail unless given prior consent. Where consent has been given to send marketing, clients have the right to withdraw this at any time.
- 8.4. All marketing emails give the recipient the opportunity to unsubscribe. Clients can also unsubscribe by contacting admin@vasaniarbitration.com or by post at Vasani International Arbitration Limited, International Dispute Resolution Centre, 1 Paternoster Lane, London EC4M 7BQ.

9. Sharing your Information with Others

- 9.1. In providing legal services, your personal information may be provided to staff or other third parties, such as to:
- a. suppliers, such as expert witnesses, barristers, or other external agencies that have been engaged on your behalf. In this instance, they are

required to act in accordance with your instructions and keep your personal information secure with an adequate level of protection;

- b. arbitrators, tribunals, government bodies and relevant regulators (the SRA and the ICO) in connection with matters relating to the provision of legal services;
- c. professional indemnity insurers, brokers, auditors and other professional advisers;
- d. clients in connection with the provision of any services subject to our commitment to confidentiality;
- e. other third parties when required by law or other regulatory authority, when there is a duty to do so to comply with legal or professional obligations (for example to comply with anti-money laundering obligations and counter terrorism measures);
- f. enforce or protect rights, property or the safety of staff and other clients (this includes exchanging information with other companies and organisations for the purposes of fraud prevention and detection and credit risk reduction);
- g. other parties in arbitration proceedings; and
- h. financial institutions providing finance for transactions.

9.2. We may be required to disclose information to the Police or Intelligence Services where required or permitted by law.

10. How Long Your Personal Information Is Kept

10.1. Your information is only retained for as long as is necessary for the purpose for which it was obtained. This could include compliance with legal obligations (by way of example, in relation to anti money laundering regulations where information must be kept for minimum periods). It could also include conducting legal work as instructed or establishing or defending claims which could be made, for example for negligence in the performance of any obligations.

11. Information Collected from You Concerning Other People

11.1. Where you provide personal information about other people, it is accepted on the understanding that you have made the other person aware about how this information will be used and disclosed.

12. Children

12.1. In matters involving children they will be represented by parents or legal guardians. If any matters involve children, it will be explained why their personal data is needed and how it will be used.

13. Where Your Personal Information Will Be Processed

- 13.1. Most of the time, your information will be processed using servers based in the UK or EEA.
- 13.2. There may be occasions where your personal information needs to be transferred outside of the UK to countries which do not provide the same level of data protections as in the UK. For example, in relation to legal claims or transactions with an international element, or where overseas agents need to be instructed to assist in performing legal services. In these circumstances, steps will be taken to ensure that your personal information is adequately protected.

14. Transfer to Other Countries

- 14.1. We may transfer personal information to suppliers, service providers and lawyers based outside of the UK or European Economic Area (EEA) for the purposes described in this privacy notice. Where we transfer personal information outside of the UK or EEA, we will conduct a risk assessment to ensure the level of protection is equivalent to that guaranteed under the UK GDPR. This includes: assessing the data protection laws and practices of the third country; potential access by public authorities of the third country; and the rights and remedies available to data subjects. Where necessary, we will adopt supplementary measures to bring the level of protection of the transferred data up to the required standard by the UK GDPR.

15. IP Addresses and Cookies

- 15.1. Some information about website users is collected automatically and may be used to review and analyse how the website is used. You can review our full Cookie Policy on our website.

16. Links to Other Websites

- 16.1. Links may be included on the website to enable you to access third party sites directly. If you follow any links, this privacy notice will not apply. Third party sites operate their own privacy policies regarding processing of personal information and the use of cookies. Please check these policies before you submit any personal data to these external sites. No responsibility is accepted for third-party websites or their use of your information or their use of cookies.

17. Your Right to Access Your Information

- 17.1. You have the right to request details of personal information which is being held about you.
- 17.2. If you would like to access your personal information, email admin@vasaniarbitration.com or contact Vasani International Arbitration Limited, International Dispute Resolution Centre, 1 Paternoster Lane, London EC4M 7BQ, with the notation "**Subject Access Request under UK GDPR**".

18. Your Other Rights

- 18.1. You also have the right to ensure that the information held about you is correct or complete information personal data about you. If you think any information is incorrect, incomplete or needs updating please get in touch. Any information will be updated as soon as possible.
- 18.2. You may also in certain circumstances:
- a. request that personal data held is erased;
 - b. request that personal data is restricted in its processing;
 - c. where your personal data is processed by automated means, you can ask the data to be transmitted to another data controller. If you request this, you will be informed whether this is possible, considering compatibility of systems of the other data controller to whom you wish the transfer to be made;
 - d. object to processing. If you raise such objection, the processing of your data must stop unless it can be demonstrated that there is an overriding legitimate business interest or that such processing is necessary in relation to legal proceedings. If you still wish the processing to stop, then this will have an impact upon any contract you have in place and you will be advised of what the consequences are to you so that you can make an informed decision;
 - e. to have a decision taken by a human (decisions are unlikely to be taken by VIA which have a legal or similarly significant effect on you by automated means);
 - f. you have a right to be notified of a personal data breach if it results in a high risk to your rights and freedoms; and
 - g. you have the right to withdraw your consent if you have given your consent to processing of any of your personal data (please note that if you withdraw your consent, this will not affect the validity of any processing carried out prior to withdrawal).
- 18.3. These requests are free of charge.
- 18.4. Depending on the nature and extent of your request, the contractual relationship with you may end. In this event, you will remain liable for any outstanding fees and disbursements incurred before the request was made. The contact information in connection with the exercise of these rights or other privacy issues is set out below.
- 18.5. If you consider a breach of any obligations in respect of your personal data has occurred, you may raise your concerns. Alternatively, you can complain to the Information Commissioners' Office. Further details can be found at

ico.org.uk. However, they will usually say that you should give the data controller the opportunity to deal with your concerns in the first instance.

19. Security and Storage

- 19.1. All information you provide in electronic format is stored on secure servers within the United Kingdom or EEA.
- 19.2. The internet is a global environment. It can involve transmission of data on an international basis. Transmission of information via the internet or any social media is not completely secure. By using the website and communicating with us electronically, you acknowledge and accept the processing of your personal information in this way.
- 19.3. Although appropriate technical and organisational measures are adopted to protect your personal information, it cannot be guaranteed that it is secured when sent to the website and transmission is at your own risk.
- 19.4. Once your information is received, either in electronic or physical form, all reasonable steps necessary to prevent unauthorised access is taken and it is ensured that your information is handled securely and in accordance with this privacy notice. Suitable electronic, physical and managerial procedures have been put in place to protect and secure the information collected.

20. Contact

- 20.1. If you have any queries or requests regarding this notice, or the procedures concerning your personal data, please contact the individual who has or had conduct of your matter in the first instance. If you are unsure of whom to contact, please contact us by email at admin@vasaniarbitration.com or by post at Vasani International Arbitration Limited, International Dispute Resolution Centre, 1 Paternoster Lane, London EC4M 7BQ.
- 20.2. Reasonable steps will be taken to resolve or answer concerns as soon as possible and normally within 30 days.
- 20.3. Kindly note that queries about legal matters should be directed to the person with conduct of your matter as identified in the correspondence with you.