



## PRIVACY POLICIES

**General:** As professionals engaged in the provision of legal services to clients, M.G. Daly & Partners (“the Firm” which expression shall include its Attorneys-at-Law and other personnel) is committed to protecting the privacy of confidential and “Personal Information” (information that directly or indirectly identifies individuals who may be clients, staff, agents, lawyers, law students, job applicants or others inside or outside the Firm). It has always been and remains the policy of the Firm to comply with the rules of professional conduct, which impose upon Attorneys-at-Law and their associated personnel a duty to preserve and protect confidential client information.

The Firm applies these Privacy Policies in light of our overarching obligations to comply with law, to preserve client confidentiality and to represent our clients as effectively as possible within the bounds of the law. The Firm is generally guided by the General Privacy Principles set out in the Data Protection Act, Chap. 22:04 of the Revised Laws of the Republic of Trinidad and Tobago. These Privacy Policies are intended to summarize the Firm’s data protection practices generally, and to advise our clients, interested law students, job applicants, web site visitors, and other third parties about the Privacy Policies that may be applicable to them. Specific terms on data protection and record retention which apply to our clients are contained in the Firm’s Terms of Engagement.

This Statement is also specifically addressed to parties outside the Firm who provide Personal Information to the Firm or who visit or use the Firm’s Web Site, apps, social media sites, extranets, as well as email messages that we send to you that contain a link to this Statement (collectively, the “Internet Services”). This Statement also describes how the firm collects, processes and discloses Personal Information in connection with the provision of legal services and the Internet Services.

**Collection and Use of Personal Information:** The Firm collects Personal Information in the course of providing legal services to clients and as provided by visitors to its Web Site or users of the Internet Services. We may also collect Personal Information about you when you interact with us on social media sites and from other third parties and may also automatically collect information that may contain Personal Information as described below in the cookie policy.

We may use that Personal Information where in our legitimate interest to do so for the following purposes:

1. to contact you and respond to your requests and enquiries;
2. to personalize your visit and use of the Internet Services and to assist you while you use those services;



3. to carry out, monitor and analyze our business or Web Site operations;
4. to conduct our recruitment or selection processes;
5. to provide you with legal services, if you are or become a client of the Firm, and otherwise deal with you, and administer the matters upon which you instruct us;
6. to contact you (unless you tell us that you prefer us not to) regarding legal or law firm developments that may be of interest to you. If you do not want to receive publications or details of events or seminars that we consider may be of interest to you, you may do so by clicking on the “unsubscribe” link in electronic communications which we, or persons acting on our behalf, may send to you;
7. to enter into or carry out contracts of various kinds;
8. to comply with applicable laws, regulations, guidance or professional obligations to which the Firm may be subject, including anti-money laundering requirements.

Where Personal Information is necessary for the firm to carry out its anti-money laundering checks, failure to provide such information may result in the Firm not being able to provide the representation.

**Confidentiality, Security, and Retention of Personal Information:** Consistent with our professional obligations, it has always been the policy of the Firm to exercise the utmost discretion regarding the information our clients entrust to us. We maintain reasonable and appropriate, albeit not infallible, physical, electronic and procedural safeguards intended to maintain the confidentiality of Personal Information, including that provided by a visitor to this Web Site and provided while using Internet Services. We do not guarantee that our safeguards will always work. We require consultants, suppliers and vendors to maintain data protections consistent with reasonable and appropriate obligations of data processors, data protection laws and regulations. We may retain information provided by you, including Personal Information, for as long as necessary to comply with our legal obligations, or to achieve the purposes for which the information was originally collected and for the purposes described herein and in our applicable policies.

**Disclosure and Transfer of Personal Information:** We do not disclose any Personal Information to unrelated parties outside of the Firm except in limited circumstances. Such circumstances include disclosures to our agents or data processors or other contractors acting on our behalf and at our direction, subject to appropriate confidentiality, privacy and information security commitments provided by the receiving party, or where we believe it necessary to provide a



service which you have requested, or as permitted or required by law, or as otherwise authorized or directed by you. Consistent with our professional obligations, we may provide Personal Information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the provision of such information is required or permitted by law, such as in connection with the investigation or assertion of our legal defenses or for our compliance matters. We operate systems that may make data related to your matters remotely accessible by our Attorneys-at-Law and we may often transfer client data which may include Personal Information between our personnel.

**Cookie Policy:** A cookie is a text file sent by a web server and placed on your computer by your web browser. Cookies can be usefully divided into two different types, session and persistent. Session cookies differ from persistent cookies primarily in that session cookies are temporary and expire and are normally deleted when you close your browser. Persistent cookies, in contrast, remain stored on your computer after you close your browser until they are deleted either because they expire or you delete them. The Firm uses cookies in connection with the Internet Services. Cookies are often used in conjunction with other Internet technologies, such as web beacons, to understand behavior on the Internet. Similarly, we may use or receive reporting from tracking scripts that recognize unique cookies issued by another Web Site. These tracking scripts are not used to gather information on your use of the Internet unrelated to the Firm, and they do not identify you unless you choose to provide Personal Information to the Firm. Although the Firm uses the services of third parties in connection with these cookies, we do not allow the third-party service provider to use Personal Information about the users of our Internet Services. The Firm uses Google Analytics. None of these cookies are strictly necessary to access our Internet Services. You may reset your browser to refuse all cookies or to allow your browser to alert you when a cookie is set, however, certain parts of the Internet Services may function differently and not as well. Unless you have adjusted your browser setting so that it will refuse cookies, our Internet Services will issue cookies when you logon to the Firm's Internet Services. For more information about how to manage your cookies preferences, you should use the "help" menu of your web browser or explore the customer support sections of your web browser. Please note that you need to configure each browser on each device that you use if you wish to opt-out or block some or all cookies.

**Do Not Track Signals:** "Do Not Track" signals are options available on your browser to tell operators of websites that you do not wish to have your online activity tracked. Our Web Site operates no differently if these "Do Not Track" signals are enabled or disabled. Our Internet Services do not allow any third parties to collect Personal Information about your online activities over time or across websites for their own purposes.

**Children:** In order to respect the privacy of minors, the firm does not knowingly collect, maintain or process Personal Information submitted online via our Internet Services by anyone under the



age of 18. To the extent the firm collects Personal Information on minors in the context of one of the purposes mentioned in the Statement, the firm will only do so with the appropriate consent or as otherwise permitted under applicable laws.

**Complaints:** Individuals may also have a right to lodge a complaint about the processing of their Personal Information with their local data protection authority.

**Changes:** We reserve the right to change these Policies at any time without advance notice. Should any new policy go into effect for our Internet Services, the firm will post it on this website and relevant Internet Services.