

# Privacy and Cookies Policy

**Fractional Legal**

**Last updated: 25 April 2026**

## 1. A Quick Summary

Your privacy matters to me. I want this policy to be clear, not hidden behind technical language.

In short:

- I only collect personal data that I genuinely need to run my Website, respond to enquiries, provide services, and send updates if you have asked for them.
- I use strictly necessary cookies to make my Website work properly. I only use non-essential cookies, such as analytics or marketing cookies, if you have given consent.
- Because I am based in Malaysia and provide services online, information you send through my Website may be received and accessed by me there .
- I do not sell your personal data.
- You have rights over your personal data, including the right to ask for access, correction, deletion, restriction, portability, or to object to certain uses.
- You can withdraw consent for marketing emails or non-essential cookies at any time.

If you want the detail, the rest of this policy explains exactly what I collect, why I collect it, how long I keep it, who I share it with, and what choices you have.

## 2. Who I Am

My Website, [www.fractionallegal.co.uk](http://www.fractionallegal.co.uk) (My Website), is owned and operated by **Jasjit Gill**, trading as **Fractional Legal / FractionalLegal.co.uk**. My Website offers legal and corporate finance consultancy services, and states that services are delivered exclusively online only.

For data protection purposes, I am the data controller. That simply means I decide how and why personal data is used.

### Contact details

**Name:** Jasjit Gill

**Trading name:** Fractional Legal / FractionalLegal.co.uk

**Email:** [jasjit.gill@fractionallegal.co.uk](mailto:jasjit.gill@fractionallegal.co.uk)

If you have any questions about this policy or how your data is handled, please contact me using the details above.

## 3. Who This Policy Applies To

This policy applies to personal data collected through or in connection with My Website, including when you:

- visit or browse My Website;

- use the contact form;
- email me directly;
- book a free introduction call;
- subscribe to receive updates, guides or news; or
- otherwise interact with My Website or with me through it.

If you later become a client, your personal data may also be handled under separate client engagement terms, a client privacy notice, or other documents given to you at that stage.

## **4. The Standards This Policy Is Written To Meet**

This policy is intended to reflect the requirements of:

- the **UK GDPR**;
- the **Data Protection Act 2018**;
- the **EU GDPR** where it applies; and
- the privacy and electronic communications rules that deal with cookies and similar technologies.

I have written it in plain English so that you can understand what happens to your information without needing to decode legal jargon.

## **5. The Personal Data I Collect**

The exact data I collect depends on how you use My Website, but it may include the following.

### **A. Information You Give Directly**

If you contact me through My Website, email me, subscribe to updates or enquire about services, you may give me:

- your first name and last name;
- your email address;
- the subject of your enquiry;
- the contents of your message;
- any information you include when booking an introduction call;
- business details you choose to share;
- your communication preferences; and
- any documents or attachments you send me.

The contact form on My Website asks for your first name, last name, email address, subject and message, and My Website also includes consent boxes for the Terms and Conditions and Privacy Policy, as well as a consent statement allowing storage of submitted information so that I can respond to the enquiry .

### **B. Information collected automatically**

When you visit My Website, some information is collected automatically, such as:

- your IP address;
- browser type and version;

- device type;
- operating system;
- pages viewed;
- time spent on pages;
- referral source;
- approximate location based on IP;
- date and time of access; and
- technical log information.

Some of this is collected through cookies or similar technologies. More on that is set out in the cookies section below.

### **C. Information From Subscriptions And Updates**

My Website includes an option to subscribe to receive news, guides and product updates . If you use that option, I may collect:

- your name, if provided;
- your email address; and
- records showing when and how you signed up, confirmed consent, opened emails, or unsubscribed.

### **D. Information About Potential Instructions**

If you ask about legal or consultancy support, I may collect information needed to decide whether I can help and whether an engagement is appropriate, such as:

- the nature of your business;
- the broad legal or commercial issue;
- documents relevant to the enquiry;
- your preferred timeline; and
- conflict-checking information where needed.

### **E. Sensitive Information**

Please do not send sensitive personal data unless it is genuinely necessary and I have asked for it, or you clearly need to include it for your enquiry.

By sensitive personal data, I mean things like information about health, race or ethnicity, religion, sexual life, biometric data, political opinions, trade union membership, or criminal allegations.

If you do send that kind of information, I will only use it where there is a proper legal basis to do so.

## **6. How I Collect Your Data**

I collect personal data in a few different ways:

- **directly from you**, when you fill in forms, email me, book a call, subscribe, or otherwise get in touch;

- **automatically**, when you browse My Website and your browser interacts with the site;
- **from service providers**, such as hosting, analytics, email or scheduling providers;
- **from public sources**, such as LinkedIn, Companies House, or company websites, where that is relevant to your enquiry or a possible engagement; and
- **from other people in your organisation**, if they refer you or involve you in an enquiry.

If you give me personal data about someone else, you should make sure you have the right to do so and that they know their information may be shared with me.

## **7. Why I Use Your Personal Data And The Legal Bases I Rely On**

Data protection law says I must have a lawful reason for using your personal data. The lawful reason depends on what I am doing with it.

Below is a clear summary.

### **A. To Respond To Enquiries And Communicate With You**

I use your data to read your message, reply to you, arrange a call, and decide whether your enquiry is something I may be able to help with.

#### **Lawful basis:**

- taking steps at your request before entering into a contract; and/or
- legitimate interests, namely running My Website, managing enquiries and communicating properly with prospective clients.

### **B. To Provide Services If You Become A Client**

If your enquiry leads to an engagement, I use your data to prepare proposals, open the matter, provide the agreed services, manage billing and administer the relationship.

#### **Lawful basis:**

- performance of a contract;
- taking steps at your request before entering into a contract;
- legal obligation, where applicable;
- legitimate interests in running my business.

### **C. To Send Newsletters, Guides And Updates**

If you choose to subscribe, I use your data to send the updates you asked for.

#### **Lawful basis:**

- consent.

You can unsubscribe at any time by using the unsubscribe link in the email or by contacting me.

## **D. To Run, Secure And Improve My Website**

I use technical and usage data to keep My Website working, troubleshoot problems, protect against misuse, and understand how the site is used so I can improve it.

### **Lawful basis:**

- legitimate interests for strictly necessary website operation, security and fraud prevention;
- consent for non-essential cookies or similar technologies, such as analytics or marketing tools, where required by law.

## **E. To Keep Records And Evidence Of Consent**

I may keep records showing when you contacted me, what preferences you chose, and whether you consented to marketing or cookies.

### **Lawful basis:**

- legal obligation, where applicable;
- legitimate interests in demonstrating compliance and managing My Website responsibly.

## **F. To Comply With Law And Protect Rights**

I may use personal data to comply with tax, accounting, regulatory, legal and compliance obligations, and to establish, exercise or defend legal claims.

### **Lawful basis:**

- legal obligation;
- legitimate interests in protecting my business and legal position.

## **8. My Legitimate Interests**

Where I rely on **legitimate interests**, those interests include:

- running and improving My Website;
- responding to genuine enquiries;
- deciding whether to accept work;
- protecting My Website and business from abuse, spam and security threats;
- keeping proper business and compliance records;
- understanding what content and services are most useful to visitors; and
- protecting legal rights.

When I rely on this basis, I consider the impact on your privacy and do not use the information in a way that is unfair, unexpected or excessive. I never sell your Personal Data.

## **9. Marketing**

My Website includes an option to subscribe to receive news, guides and product updates .

If you sign up for these, I will send you the materials you asked for. I will not add you to a newsletter list just because you sent an enquiry through the contact form, unless you have separately agreed to that.

You can stop marketing emails at any time by:

- clicking the unsubscribe link in any email; or
- emailing me at [jasjit.gill@fractionallegal.co.uk](mailto:jasjit.gill@fractionallegal.co.uk) .

Even if you unsubscribe from marketing, I may still contact you about a direct enquiry you made, a live discussion we are having, a service you asked for, or a legal or administrative matter affecting you.

## **10. Cookies And Similar Technologies**

### **10.1 What cookies are**

Cookies are small text files placed on your device when you visit a website. Some are essential to make My Website function properly. Others help website owners understand usage, remember preferences, or measure the success of communications.

My Website may also use similar technologies such as pixels, tags, scripts, local storage and server logs.

### **10.2 The Types Of Cookies I May Use**

#### ***Strictly Necessary Cookies***

These are essential for My Website to work properly. They may be used to:

- remember cookie preferences;
- maintain security;
- support page loading and website functionality;
- manage form submissions;
- detect abuse or malicious traffic; and
- keep My Website stable and available.

These cookies do not require consent where they are genuinely necessary.

#### ***Preference Or Functional Cookies***

These help My Website remember choices you make, such as language, layout or other settings.

I will only use these where appropriate and, if required by law, with your consent.

#### ***Analytics Cookies***

These help me understand how visitors use My Website, such as which pages are viewed most often, where visitors come from, and whether content is helpful.

These cookies are not essential. I will only use them if you consent.

#### ***Marketing Or Advertising Cookies***

These may be used to measure campaigns, track visits across websites, or help show more relevant messages or content.

These cookies are not essential. I will only use them if you consent.

### **10.3 How Cookie Consent Works**

When you first visit My Website, you should be given a cookie banner or preference tool that allows you to:

- accept all cookies;
- reject non-essential cookies; or
- choose cookie categories individually.

Unless a cookie is strictly necessary, it should not be placed on your device until you have consented.

You can also change your mind later by revisiting the cookie settings tool on My Website.

### **10.4 Browser Controls**

Most browsers let you control cookies through their settings. You can usually block or delete cookies there as well.

Please note that if you block strictly necessary cookies, parts of My Website may not function properly and you may not be able to use My Website.

### **10.5 Cookie Details**

The exact cookies used on My Website may change from time to time as the site develops, plugins are updated, or third-party tools are added or removed.

The current cookie banner or cookie preference centre should show the live categories in use and, where available, the relevant provider and duration. This policy explains the principles behind that use.

### **10.6 Do Not Track**

Some browsers offer a “Do Not Track” setting. Because there is no single accepted standard for how websites should respond to this signal, My Website may not respond to it in a consistent way. You can still manage cookies through My Website’s cookie settings and your browser controls.

## **11. Analytics And Website Performance**

If I use analytics tools, I use them to understand things like:

- how many people visit My Website;
- which pages are most useful;
- how visitors move through the site;
- whether the contact journey works properly; and
- how I can improve My Website.

Where those tools rely on cookies or similar technologies that are not strictly necessary, I only use them with your consent.

Where possible, I use settings that reduce privacy impact, such as limiting retention, avoiding unnecessary data collection, and enabling privacy-friendly options.

## **12. Contact Forms, Emails And Call Bookings**

My Website encourages visitors to book a free introduction call, use the contact form, or email directly .

If you use any of these routes:

- I will use your details to respond to you and deal with the enquiry;
- I may keep a record of the communication;
- I may make brief internal notes about suitability, scope, timing or follow-up;
- I may check whether there is any reason I should not act, including availability or conflicts; and
- I may keep the correspondence in my email system and related business records.

Please do not send large amounts of confidential material, highly sensitive personal data, or urgent deadline-driven instructions through a website form unless I have asked you to do so and confirmed that I can receive it safely.

## **13. If Your Enquiry Leads To An Engagement**

If you become a client, I may need additional information from you, such as:

- billing details;
- company or organisational information;
- the names and roles of relevant people;
- documents needed for the work;
- communications relating to the matter; and
- information needed for compliance, record-keeping and administration.

At that point, I may give you additional privacy information as part of the engagement process.

## **14. Who I Share Your Data With**

I do not sell personal data.

I only share personal data where there is a proper reason to do so, and only to the extent reasonably needed. Depending on how My Website is run and how you interact with it, I may share data with:

- website hosting providers;
- email and communications providers;
- website support or development providers;
- cloud storage or document management providers;
- newsletter or mailing list providers;
- call booking or calendar providers;
- analytics or cookie consent providers;
- professional advisers, such as accountants, insurers or legal advisers;
- regulators, courts, law enforcement or public authorities, where required;
- payment or invoicing providers, if relevant to a paid engagement; and
- specialist consultants or local counsel, but only where necessary and appropriate.

All such sharing is done for legitimate business reasons, contractual performance, legal compliance, or with your consent where needed.

Where a third party handles personal data for me as a service provider, I expect them to do so under proper contractual and confidentiality controls.

## 15. International Transfers

This is an important point.

My Website states that I am based in Malaysia and operate online . That means information you send through My Website may be received, accessed or stored in Malaysia.

I may also use service providers located in, or with servers in, the UK, the EEA, the United States, or other countries.

Whenever personal data is transferred outside the UK or the EEA to a country that is not recognised as providing an adequate level of protection, I will use an appropriate legal safeguard where required. Depending on the transfer, that may include:

- the **European Commission's Standard Contractual Clauses**;
- the **UK International Data Transfer Agreement**;
- the **UK Addendum to the EU Standard Contractual Clauses**; or
- another lawful transfer mechanism recognised under UK GDPR or EU GDPR.

You should be aware that data protection laws in some countries may not be identical to those in the UK or EEA. Where required, I take reasonable steps to protect your information when it is transferred internationally. I only use a reputable and internationally recognised hosting service.

## 16. How Long I Keep Your Data

I do not keep personal data for longer than I reasonably need it. Retention depends on what the data is and why I hold it.

As a general guide:

- **general enquiries that do not lead to an engagement:** usually up to **6 months** after the last meaningful contact;
- **introduction call or consultation booking records:** usually up to **6 months** after the call, unless needed longer for follow-up or compliance;
- **newsletter subscription data:** until you unsubscribe, withdraw consent, or I decide to stop sending updates; I may keep a limited suppression record so I know not to contact you again;
- **cookie consent records:** for as long as reasonably necessary to show compliance and manage preferences;
- **technical logs and security records:** only for as long as reasonably needed for security, troubleshooting and system integrity;
- **client matter and billing records:** usually for the period required by law, regulation, tax rules, limitation periods, or prudent business record-keeping.

Sometimes I may keep data for longer if:

- the law requires it;
- there is an ongoing dispute, complaint or claim;
- I need it to establish, exercise or defend legal rights; or
- there is another strong and lawful reason to retain it.

When data is no longer needed, I will delete it, anonymise it, or securely archive it where appropriate.

## 17. Your Data Protection Rights

Depending on where you are and the law that applies, you may have the right to:

- **access** the personal data I hold about you;
- **correct** inaccurate or incomplete data;
- **erase** your data in some circumstances;
- **restrict** how your data is used in some circumstances;
- **object** to processing based on legitimate interests;
- **withdraw consent** at any time where I rely on consent;
- **data portability**, meaning to receive certain data in a usable format and ask for it to be transferred; and
- **complain** to a regulator.

These rights are not absolute. Sometimes I may have lawful reasons why I cannot fulfil a request in full, but if that happens I will explain why.

If you want to exercise any of these rights, please contact me using the details in this policy.

### Withdrawal Of Consent

If I rely on your consent, you can withdraw it at any time. This will not affect the lawfulness of anything done before consent was withdrawn.

### Objecting To Legitimate Interests

If I rely on legitimate interests and you object, I will consider your request carefully and stop unless I have compelling legitimate grounds to continue or another lawful basis applies.

## 18. Complaints

If you have concerns about how I handle your personal data, I would appreciate the chance to deal with it first. Please contact me and I will do my best to resolve it promptly and fairly.

If you are in the UK, you also have the right to complain to the **Information Commissioner's Office (ICO)**.

If you are in the EEA, you may also complain to your local data protection authority.

## **19. How I Protect Your Data**

I take reasonable technical and organisational steps to protect personal data against loss, misuse, unauthorised access, alteration or disclosure.

These steps may include:

- secure hosting and access controls;
- password protection and device security;
- appropriate use of reputable service providers;
- limiting access to data on a need-to-know basis;
- keeping software and plugins up to date where possible; and
- maintaining sensible administrative and security practices.

No website, email system or internet transmission is ever completely risk-free. For that reason, while I take security seriously, I cannot guarantee absolute security.

## **20. Third-Party Websites And Services**

My Website may contain links to third-party websites, services, scheduling tools, external profiles or content.

If you click on those links or use those services, their own privacy policies and terms will apply. I am not responsible for the privacy practices of third-party sites that I do not control.

You should read their policies before submitting personal data to them.

## **21. Children**

My Website is aimed at adults and business users. It is not intended for children.

I do not knowingly collect personal data from children. If you believe a child has submitted personal data through My Website, please contact me and I will deal with it appropriately.

## **22. Automated Decision-Making**

I do not use your personal data to make decisions about you solely by automated means in a way that produces legal effects or similarly significant effects.

If that changes, this policy will be updated.

## **23. Changes To This Policy**

I may update this policy from time to time to reflect changes in the law, My Website, the way My Website operates, or the service providers I use.

The latest version will always be posted on My Website with the “Last updated” date at the top.

If the changes are significant, I may also take additional steps to draw them to your attention where appropriate.

## **24. Contact me**

If you have any questions about this Privacy and Cookies Policy or want to exercise your rights, please contact:

**Jasjit Gill**

**Fractional Legal / FractionalLegal.co.uk**

**Email:** jasjit [gill@fractionallegal.co.uk](mailto:gill@fractionallegal.co.uk)