

# Privacy Notice

## Relating to your personal data



### Background

This privacy notice describes why and how we collect and use any personal information about you by which you can be identified, directly or indirectly (“**personal data**”) during and after your relationship with us, in accordance with the General Data Protection Regulation (**GDPR**) and Data Protection Act 2018 which implements the GDPR in the UK.

The GDPR applies to every client who is a “natural person” whether you instruct us for your own personal reasons or on behalf of a “legal person”, such as a company or other incorporated legal entity (in which you might be a director, senior employee or shareholder).

We are committed to protecting the privacy and security of your personal data. We are a “data controller”. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the GDPR to notify you of the information contained in this privacy notice. Our details are set out at the bottom of this page.

### Why and on what basis do we collect personal data?

We collect and use (or ‘process’) the personal data you provide (i) with your consent, (ii) in order to provide you with the legal services you have requested under our contract with you, and (iii) in order to fulfil legal and regulatory obligations to which we are subject as solicitors (such as verification of your identity under anti money-laundering regulations). You may withdraw your consent under (i) to the use of your personal data at any time but, obviously, we could not then continue to provide our services to you under (ii) and we are still obliged to retain copies of your personal data under (iii).

### What personal data is collected?

The personal data we will collect from you would typically include the following information:

- Personal contact details such as your name, gender, date of birth, telephone numbers, and postal and email addresses;
- Photographic evidence (such as copy of your passport or driving licence);
- Documents that relate to the matter or case on which you are seeking our legal advice and from which you can be identified, directly or indirectly, which may include your bank account details.

While acting for you or advising you, personal data about you might also be sent to us by other people, such as legal representatives for other persons involved in the case or issue in which we are instructed by you.

### Personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way and collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Kept securely
- Kept up-to-date and kept only as long as necessary for the purposes we have told you about.

### Lawful use of your personal data

We will only use your personal data when the law allows. As a firm of solicitors, we must keep your affairs confidential except where disclosure is required or permitted by law or by you. Most commonly, we will use your personal data also in the following circumstances:

- Where we need to perform the contract we have entered into with you. This may require us to provide your personal data to third parties (see below);
- Where we need to comply with a legal obligation;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Rarely, we may also use your personal data where we need to protect your interests (or someone else’s interests)

### Relevant use and sharing your data

- We will never sell your personal data and it will never be subject to automated decision making or profiling.

- We may have to share your data with third parties as we carry out our contract for you to give legal advice and representation. Such third parties might include legal representatives advising or acting for other persons involved in the case or issue in which we are instructed by you; to courts or tribunals (in dispute cases); to government agencies such as HMRC and the Land Registry (in property transaction cases); to experts and other professionals and agents involved in your case or matter, and others, for the proper performance of the contract on your behalf; where your case requires it, for example if you are negotiating or in dispute with parties outside the UK, to such third parties in other countries where it is important and required in order to carry out our legal services to you.
- We will also share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. For example, we contract with the following people who may have access to our systems or records on which we hold client and staff personal data:
  - IT consultants who maintain the computer systems by which we communicate with you;
  - The provider of our legal accounts programs by which we fulfil our obligations under the Solicitors Accounts Rules;
  - Our accountants who undertake the annual audit required of all solicitors as to compliance obligations under the Solicitors Accounts Rules in relation to the holding of client money;
  - Our provider of electronic verification of identity of clients in certain circumstances to ensure compliance with the anti-money laundering obligations.

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with the GDPR. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes, in accordance with our instructions or legal requirements.

### ***Security of your data***

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to employees, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### ***Retention of your data***

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. We will retain your personal data only for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, professional indemnity insurance reporting, tax or other regulatory requirements. We shall store the tangible (paper) file on your matter (except for any of your papers which you ask to be returned to you) in our offices and then off-site with a secure archive storage company for at least 3 years (and usually for 7 years) after sending you a final bill or after the conclusion of your case, or after informing you that the file is to be closed. We shall store the intangible (electronic) file on your matter (which will not contain all the information that will appear in the tangible file) for 15 years for archive purposes.

### **Your rights in connection with your personal data**

Under certain circumstances, by law you have the right (normally on a free of charge basis) to:

- Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you completed or corrected.
- Request erasure of your personal data (unless there is a lawful reason for retaining the data). This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party (although this is unlikely to be relevant to you as we do not process your personal data by automated means).

Any request is best made in writing to our office address or to [GDPR@camerons.co.uk](mailto:GDPR@camerons.co.uk) or by telephone to your contact partner or the lawyer handling your case. We shall respond to any request you make as soon as we can and always within one month. If you have reason to complain about our use of your data you may do so to the Office of the Information Commissioner by telephone to 0303 123 1113 or via its website at <https://ico.org.uk/concerns/>.