

# Data Privacy Notice

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and the supervisory authority responsible for handling complaints.

## Who we are

Pothecary Witham Weld incorporating Haslam & Payne Solicitors (PWW) of 84 Eccleston Square, London SW1V 1PX, collects, uses and is responsible for certain personal information about you. When we do so, we are regulated by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and we are responsible as a 'data controller' of that personal information for the purposes of those laws.

## Whose data do we hold?

We may hold data about the following people:

- clients;
- suppliers and service providers;
- petitioners and respondents;
- complainants;
- enquirers;
- advisers, consultants and other professional experts; and
- employees

## How we collect your personal information

Your personal data may be collected by us in a number of ways, including:

- through your making an enquiry of the firm;
- through our provision of legal services to you;
- during the course of dealings with you for or on behalf of a client;
- when you provide us with information in relation to your attendance at any of our seminars or other hosted events;
- when you provide information to us by filling in forms on this website;
- when you contact us for these and any other reason, we may monitor and keep a record of that correspondence (in whatever form);
- when we collect publicly available information about you or your business (including through electronic data sources); and
- when we collect your personal data from third parties (for example our clients or other law firms).

## The personal information we collect and use

The categories of personal information that we may collect includes, but is not limited to, the following:

- identity and contact details (including names, postal addresses, email addresses and telephone numbers);
- financial details
- professional information such as job titles, previous jobs, professional experience and qualifications; and
- details of your visits to this website including, but not limited to, traffic data, location data, weblogs and other communication data.

Where necessary and legally permitted, we may also collect sensitive personal information such as diversity data, physical or mental health data, and details of offences and related proceedings.

## How we use your personal information

We use your personal information to:

- provide our services to you;
- deal with your enquiries and requests;
- to maintain our accounts and records.
- provide you with information about our services and to advise you of news and industry updates and free events organised by our firm;
- to provide you with any other information that you request from us;
- to comply with our legal and professional responsibilities; and
- where we have other legitimate reasons, such as for internal compliance and security purposes.

## Information collected from other sources

- As part of Anti-Money Laundering legislation requirements, we may undertake a web-based AML check on all new clients. This information is sourced from suppliers such as BT, Royal Mail, HM Treasury, OFAC, Creditsafe, Equifax, Experian, Lawyer Checker and LexisNexis.
- We may process information contained in any enquiry you send to us via our website or any company email address. Enquiry data may include your name and email address, plus any details you provide to us to support your enquiry.
- We collect information about your use of our website through cookies. Cookies are information that files stored on your computer, tablet or smartphone access to help websites remember who you are, as well as information about your visit. The information is processed through Google Analytics and helps us to understand how you engage with us through our site. The site usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths.

- We also use third party cookies to allow you to share content directly on the social networking/sharing sites like LinkedIn, Facebook, Twitter or Google+. Examples would be if you wanted to “like” or “tweet” about an article we have posted.

## Who we share your personal information with

We routinely share your personal information with our software provider Solicitors Own Software Ltd and our IT provider Hex IT Systems Limited. If, on your instruction, we are working with other professional service providers we may need to disclose relevant information about your matter to them. The information shared could include any of the data listed in the “The personal information we collect and use” section of this policy.

The types of third parties are:

- Barristers
- Medical experts, healthcare professionals, social, welfare or dispute resolution organisations
- Courts and tribunals
- Ombudsman and regulatory authorities
- Financial organisations
- Credit reference agencies

This data sharing enables us to provide our services to you. We will share personal information with law enforcement or other authorities if required by applicable law. Save for the above, we will not share your personal information with any other third party.

## How long your personal information will be kept

Where you are a client of the firm, we will hold your personal information for the duration of a matter upon which you have instructed us and after a matter has been closed, for as long as is necessary to comply with any legal obligations under applicable laws. In most instances, this will be 6 years after a matter has been closed but may be longer depending upon the circumstances.

## Reasons we can collect and use your personal information

We rely on the ‘legitimate interests’ test under UK GDPR as the lawful basis upon which we collect and use your personal data. Our legitimate interests are that, without collecting this personal information, we cannot provide our services to you.

We also process your personal data to comply with our legal obligations, which require certain personal information to be collected and retained. For example, the Money Laundering Regulations 2007 require that firms keep certain customer due diligence material for a period of 5 years after a matter has been closed.

In sending you our firm’s newsletter and invitations to free events and seminars which the firm organise, we consider these to be part of the service we provide to you and also rely upon the ‘soft opt-in’ exception under UK GDPR as we consider that we are

marketing similar products or services. For these types of communications, you can change your preferences to unsubscribe from receiving such communications. If you would like to unsubscribe, please contact us using the details set out below. There will also be an option at the bottom of each email to unsubscribe from receiving further emails.

We will only process sensitive personal information (known as special category data under UK GDPR) where you have provided this to us in pursuance of the provision of legal services to you and we will therefore deem that you have thereby consented to the processing of such data.

## Your rights

Under UK GDPR you have a number of important rights which you may exercise free of charge. In summary, these include rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this information to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information; and
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK GDPR.

If you would like to exercise any of those rights, please contact us using the details set out below.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that we can resolve any query or concern you raise about our use of your information. However, if you wish to register a complaint about our handling of your personal data with the ICO, who are the supervisory authority for UK GDPR, you can contact them at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by telephone on 0303 123 1113.

## Changes to this privacy notice

This privacy notice was published on 23 May 2018 and last updated on 3<sup>rd</sup> January 2022. We may change this privacy notice from time to time. When we do so, we will inform you via our website.

## How to contact us

Please contact us if you have any questions about this privacy notice or the information that we hold about you. You can email us at [info@pwwsolicitors.co.uk](mailto:info@pwwsolicitors.co.uk), write to us at 84 Eccleston Square, London SW1V 1PX or call on 0207 821 8211.