

## Data Privacy Notice

Davey Law is committed to protecting and respecting your privacy.

This notice sets out how, and on what basis, we will use the personal data you provide to us, the procedures we have in place to safeguard your data, and how you can instruct us to limit or remove the use of that data. By providing your personal information to us you are agreeing to us using your information as described in this notice.

### Definitions

<b>We or Us:</b>	Davey Law Ltd, whose registered office is at 10-12 Dollar Street, Cirencester, Gloucestershire GL7 2AL Tel 01285 654875
<b>Personal data:</b>	Any data or information, in electronic or hard copy, that identifies you personally or which relates to you and in which you are identifiable
<b>Special categories of personal data (sensitive personal data)</b>	Sensitive information relating to you, namely health records, sexual orientation, political opinions, religious beliefs, racial or ethnic origin, trade union membership, criminal offences, and genetic or biometric data

### Personal data we process

- Your name and contact details
- One or more forms of ID to enable us to carry out anti-money-laundering and other due diligence checks
- Personal and financial information relating to your legal matter
- Special categories of personal data, where relevant to your legal matter

### Our lawful basis for processing your personal data and special categories of personal data (sensitive information)

You have instructed us to give you legal advice and/or representation. The solicitor-client relationship is a contractual one. We must collect, process and store personal information about you to perform this contract, and to fulfil our legal and regulatory obligations to carry out anti-money-laundering and other due diligence checks.

For special categories of personal data, we are permitted to process your data (such as health records) for the purposes of giving legal advice.

For marketing purposes, as a client of this firm, we have a legitimate interest in contacting you to offer you services or information which we believe may be relevant and appropriate to you. You will always be given the option to opt-out if you do not wish to be contacted in this way.

## How we use your personal data

We use information you provide to us in the following ways:

- to identify you and provide you with the legal services you have requested
- to carry out our legal and regulatory obligations arising from the contract between us
- to deal with your feedback, queries or complaints
- to provide you with information about our services
- to administer, support, improve and develop our business generally
- to enforce our legal rights
- to process your job application, if you apply to work for us
- to fulfil our legal requirement to co-operate with law enforcement, government agencies or public bodies

## Where we get your personal data from

- You or your representatives
- Public records
- Other parties you instruct us to contact (such as medical professionals, employers, estate agents, accountants, banks, lenders, surveyors, courts and other advisors and specialists related to your matter)
- Our client or other contacts in a matter may provide us with information about you if you are involved in a transaction or dispute with one of our clients or have a connection with them, such as being a tenant or employee of a client.

## Your data rights

You have the right to:

- Be informed about the collection and use of your personal data
- Ask for a copy of your personal data (known as a Subject Access Request) to be supplied to you, free of charge, in a suitable format
- Have mistakes rectified
- Have your personal data erased by us, or restrict the way we process your personal data (subject to certain conditions)
- 'Port' your personal data to another provider
- Object to us using your personal data for direct marketing
- Not be subject to 'automated processing' (often referred to as 'profiling')

You simply need to contact us to exercise any of your rights. In the case of marketing, there is always an 'unsubscribe' button in our marketing emails.

For more information on your legal rights, please see the Information Commissioner's website ([www.ico.org.uk](http://www.ico.org.uk)).

## **Retention of personal data**

There is no standard timescale for the retention of data. We are required by our insurers and regulators to keep your file and personal data for minimum periods. We are not however permitted to keep your personal data indefinitely or for longer than is necessary.

Our retention policy is that the minimum period we will keep files and other personal data relating to a legal matter is six years. We may keep your file for significantly longer than that if it is necessary and in our legitimate interests to do so (for example files relating to wills, property or children, or where you request this).

We operate a rolling annual programme of file destruction. All our files and other documents containing personal data are destroyed securely, reducing the risk that personal data becomes inaccurate or out of date.

## **Sharing your personal data**

We may need to share your personal data with other professionals who we instruct on your behalf (such as barristers and doctors), third parties who are vital to a transaction (such as mortgage providers or the courts), providers of services necessary to progress a legal matter (such as ID verification), and people who you ask us to share your personal data with (such as estate agents, family members or other representatives).

We may also need to share your personal data with our regulators, insurers, and law enforcement agencies.

We may use external auditors to review our files for training, compliance and quality.

All such third parties are required to maintain confidentiality in relation to your personal data.

## **Where we hold your personal data**

Your data will be stored at our offices and on our IT equipment, or where your information is shared with a third party, at their premises or on their IT equipment.

We archive our closed paper files to a secure facility prior to destruction. Details are available on request.

## **Transferring your personal data outside of the EEA**

Since we do not have offices outside England & Wales, we have no reason to transfer your personal data outside the UK or European Economic Area unless you or a third party with whom we must share your personal data are based outside the UK or EEA.

Where we use third party IT services (such as 'cloud' based software or data storage) we shall take all reasonable steps to ensure your personal data is held and processed in accordance with current regulations.

### **Data Protection Officer**

We do not have a Data Protection Officer (DPO) but have appointed a Privacy Manager to implement our data protection policies and procedures. Our Privacy Manager is Peter Davies, who can be contacted at [pdavies@daveylaw.co.uk](mailto:pdavies@daveylaw.co.uk) or 01285 654875.

### **Complaints and questions**

If you have a question or complaint about our use of your personal data, in the first instance please contact our Privacy Manager.

You may also make complaints direct to the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or call 0303 123 1113. We are registered with the ICO as Davey Law Limited, Registration Reference Z3139994.