

## Privacy Notice

### Introduction

Parry Law takes your privacy very seriously. We ask that you read this Privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint. By continuing to use our site you are accepting and consenting to the practices described in this policy.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Parry Law's head office is at 12-14 Oxford Street Whitstable Kent CT5 1DE.

### The information we collect about you

When you do business with us or contact us through our website we will collect the following personal information from you:

- Name
- Postal address and telephone number
- Information to enable us to check and verify your identity, e.g. your date of birth or passport details
- Electronic contact details, e.g. your email address and mobile phone number
- Information relating to the matter in which you are seeking our advice or representation
- demographic information such as postcode, preferences and interests
- Details of your visits to our site: (including, but not limited to, traffic data, location and log in data, weblogs, page interaction information and other communication data) and the resources that you access.

When you do business with us or contact us through our website we may collect the following personal data depending on why you have instructed us:

- Your National Insurance and tax details
- Your bank and/or building society details
- Credit/Debit card information
- Your financial details so far as relevant to your instructions, e.g. the source of your funds if you are instructing on a purchase transaction
- Details of your spouse/partner and dependants or other family members, e.g. if you instruct us on a family matter or a will

- Your employment status and details including salary and benefits, e.g. if you instruct us on matter related to your employment or in which your employment status or income is relevant
- Details of your pension arrangements, e.g. if you instruct us on a pension matter or in relation to financial arrangements following breakdown of a relationship
- Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), e.g. if you instruct us on matter related to your employment or in which your employment records are relevant

This personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

### **How your personal data is collected**

We collect most of this information from you. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
  - sanctions screening providers;
  - client due diligence providers;
- from a third party with your consent, e.g.:
  - your bank or building society, another financial institution or advisor;
  - consultants and other professionals we may engage in relation to your matter;
  - your employer and/or trade union, professional body or pension administrators;
  - your doctors, medical and occupational health professionals;
- via our website—we use cookies on our website (for more information on cookies, (see ‘**Cookies**’)
- via our information technology (IT) systems, e.g.:
  - case management, document management and time recording systems;
  - reception logs
  - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV, communications systems and email systems;

### **How and why we use the information about you**

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or

- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

| What we use your personal data for  | Our reasons   |
|---|---|
| To provide legal services to you  | For the performance of our contract with you or to take steps at your request before entering into a contract   |
| Conducting checks to identify our clients and verify their identity<br>Screening for financial and other sanctions or embargoes<br>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulator | To comply with our legal and regulatory obligations   |
| Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies   | To comply with our legal and regulatory obligations   |
| Ensuring business policies are adhered to, e.g. policies covering security and internet use   | For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you                                      |
| Operational reasons, such as improving efficiency, training and quality control   | For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price  |
| Ensuring the confidentiality of commercially sensitive information  | For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information<br>To comply with our legal and regulatory obligations  |
| Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, work type or other efficiency measures   | For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price  |
| Preventing unauthorised access and modifications to systems   | For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you<br>To comply with our legal and regulatory obligations |

| What we use your personal data for   | Our reasons  |
|--|--|
| Updating and enhancing client records  | <p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services</p> |
| Statutory returns  | To comply with our legal and regulatory obligations  |
| Ensuring safe working practices, staff administration and assessments  | <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>   |
| <p>Marketing our services to:</p> <ul style="list-style-type: none"> <li>—existing and former clients;</li> <li>—third parties who have previously expressed an interest in our services;</li> </ul> | For our legitimate interests or those of a third party, i.e. to promote our business to existing and former clients  |
| External audits and quality checks, e.g. CQS accreditation and the audit of our accounts   | <p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>  |
| Aggregate information and statistics for the purposes of monitoring website usage. These statistics will not include information that can be used to identify you.                                   | For our legitimate interests or a those of a third party, i.e. to help us to develop our website and our services.   |

## Cookies

A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### **Who we share your personal data with**

We routinely share personal data with:

- professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors or other experts;
- other third parties where necessary to carry out your instructions, e.g. your mortgage provider or HM Land Registry in the case of a property transaction or Companies House;
- our insurers and brokers;
- external auditors, e.g. in relation to CQS accreditation and the audit of our accounts;
- our bank

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

### **Where your personal data is held**

Information may be held at our offices and those of our [group companies, ]third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with').

### **How long your personal data will be kept**

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

## How we protect your information

We will use all reasonable efforts to safeguard your personal information from being accidentally lost, or used or accessed unlawfully. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or disclosure. We have in place security procedures and technical and organisational measures to safeguard your personal information. We limit access to your personal data to those who have a genuine business need to access 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.

## Access to your information and updating and correcting your information

You have the following rights, which you can exercise free of charge:

|   |  |
|---|--|
| Access  | The right to be provided with a copy of your personal data   |
| Rectification   | The right to require us to correct any mistakes in your personal data  |
| To be forgotten   | The right to require us to delete your personal data—in certain situations   |
| Restriction of processing                                 | The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data  |
| Data portability  | The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations   |
| To object   | The right to object:<br>—at any time to your personal data being processed for direct marketing (including profiling);<br>—in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests. |
| Not to be subject to automated individual decision-making | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you   |

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please write to The Practice Manager, Parry Law, 12-14 Oxford Street, Whitstable CT5 1DE. Please let us have enough information to identify you (e.g. your full name, address and client or matter reference number), proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill) and let us know what right you want to exercise and the information to which your request relates.

### **Changes to Privacy policy**

We keep our Privacy policy under regular review. If we change our Privacy policy we will post the changes on this page, and place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. This Privacy policy was last updated on 25/05/2018.

### **How to contact Parry Law**

We welcome your views about our website and our Privacy policy. If you would like to contact us with any queries or comments please send an email to Carolyn Parry on [Carolyn.Parry@parrylaw.co.uk](mailto:Carolyn.Parry@parrylaw.co.uk) or send a letter to Carolyn Parry at 12-14 Oxford Street Whitstable Kent CT5 1DE.

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### **Links to other websites**

Our website may contain links to other websites. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.