

## Privacy Policy

### Introduction

Parry Law takes your privacy very seriously. We ask that you read this privacy policy carefully. This privacy policy sets out how we will process and use any personal data that you provide to us, or that we may collect from or about you as a result of visiting our website. By continuing to use our website you are accepting and consenting to the practices described in this policy.

In the event that we ask you to provide any information by which you can be identified when using this website, then we will only use that information in accordance with this privacy policy.

Please note that this policy may be updated from time to time. Please therefore check this page to ensure that you continue to be in agreement with any changes that we may have made.

This policy was last updated in August 2021.

Our head office is at 12-14 Oxford Street Whitstable Kent CT5 1DE. Our Senior Partner, Stephen Parry, is responsible for this policy.

### The information we collect

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

- Your name
- Your contact details (including email address, postal address and telephone numbers)
- Information to enable us to check and verify your identity, e.g. your date of birth and/or passport details
- Information relating to the matter in which you are seeking our advice or representation
- information such as postcode, preferences and interests
- Other information used in conjunction with customer surveys and/or offers
- Details of your visits to our website: (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 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 better understand your needs and to enhance the quality of the service that we provide to you,
- To create, update and maintain our internal records,
- To inform you of services or products that we have that may be of use to you, including where you have consented to receive marketing information, in respect of our services,
- 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.

Please note that where information is sent to you following your consent to receive that information you may at any time unsubscribe or withdraw your consent by emailing [contact@parrylaw.co.uk](mailto:contact@parrylaw.co.uk)

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:

<b>What we use your personal data for</b>	<b>Our reasons</b>
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 Screening for financial and other sanctions or embargoes 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

What we use your personal data for	Our reasons
	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 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 To comply with our legal and regulatory obligations
Updating and enhancing client records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations 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
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations 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
Marketing our services to: —existing and former clients; —third parties who have previously expressed an interest in our services;	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	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 To comply with our legal and regulatory obligations
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.

## **Links to other websites**

In the event that you follow links to other websites from our website, we cannot provide any assurances in relation to the content, accuracy or privacy of those websites, and cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. You should exercise caution and look at the privacy statement applicable to the website in question.

## **IP ADDRESSES AND COOKIES**

We may collect information about your computer; this is statistical data concerning your browsing actions and does not identify you individually. This information includes your IP address where available, operating system and browser type, for system administration and to report collective information to our advertisers.

We may also collect information about your general internet usage using cookie files stored on the hard drive of all computers. The cookies contain valuable information that is transferred to your computer's hard drive. In collecting this information, we are able to improve our site and deliver a better and more personalised service. You can refuse to accept cookies but note that in doing this you may be unable to access certain parts of our site.

You can do this by activating the setting on your browser which allows you to refuse the setting.

## **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 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 retain your personal data in accordance with our usual retention periods, details of which are set out in terms of business sent to you on confirmation of those instructions. We will keep your personal data after we have finished advising or acting for you for the following 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.
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When it is no longer necessary to retain your personal data, we will delete or anonymise it.

### **How we protect your information**

We are committed to ensuring that your information is secure. 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 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.

## **Your Rights**

In the event that you are not happy with any aspect of our website or our use of your personal data you have the right to complain to the Information Commissioner at [ico.org.uk](http://ico.org.uk) - Tel: 0303 123 1113.

You have the right to obtain confirmation that your personal data is being processed by us and obtain a copy of your personal data from us. This will be provided without charge. Please send such requests to:

The Practice Manager, Parry Law, 12-14 Oxford Street, Whitstable CT5 1DE or [contact@parrylaw.co.uk](mailto:contact@parrylaw.co.uk).

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.

You also have various other rights in relation to your personal data which you may be able to exercise (depending upon the circumstances). These include:

- the right to ask us to correct personal data,
- the right to ask us to delete your personal data or stop processing it, unless it is necessary for us to retain it to comply with our legal obligations and/or the exercise or defence of legal claims,
- the right to object to us using your personal data.

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](#).

## **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 ([contact@parrylaw.co.uk](mailto:contact@parrylaw.co.uk)) or letter to our Practice Manager.