

## **PRIVACY POLICY**

The firm will collect from you data which will enable you to be identified. This includes copies of your passport and copies of utility bills. These are called sensitive data and our requirements may differ depending on the work we are asked to carry out for you.

We will also have communications with you and with third parties both electronically and in hard form and these are called non-sensitive data.

We will collect from you this information – sometimes in the form of a client information questionnaire – and will use the information only for the purposes of carrying out the work you have requested us to do for you. The collection will be subject to Data Protection Law and our duty of care. Information may be obtained from you or from a third party where you have instructed us to contact that third party and may include any information which can directly or indirectly identify you.

We do not share personal information with third parties except to enable us to carry out the work you have instructed us to do or where it is required by law.

The firm's cashiering work is outsourced to a third party which is a secure accounting company recognised in the legal field. Our computer systems and server are maintained and looked after by an independent IT consultant company. We have a firm of Chartered Accountants who carry out an audit of our work as required by the Solicitors Regulation Authority. We are currently contemplating utilising a case management system to be installed by a company recognised in the legal field as providing this form of software for the legal profession.

All these companies need to have access to our systems and all the data we hold. They all hold their own GDPR compliant systems and we have confirmation of this from each company.

In conveyancing matters we will need to share your National Insurance number with Her Majesty's Revenue & Customs if we have to complete a Stamp Duty Land Tax Return.

In probate matters we will need to share sensitive information with HMRC and with the Probate Registry. If we are obtaining a Lasting Power of Attorney then we will need to provide information about you to the Office of the Public Guardian.

These are all examples of providing details of your information to third parties. It is not exhaustive. However all our staff and third parties are required to respect your privacy and to meet Data Protection requirements.

Non sensitive information received by email such as your email address can never be guaranteed to be totally secure. Any information sent to us by email is

sent at your own risk but we do ask you not to send extremely sensitive information such as bank details by email unless it is by pdf and we will always telephone you to check such information before we send money to you.

We will retain your non-sensitive information for as long as is necessary after completion of the work for which we have been instructed. The Law Society requires us to keep files for a minimum period of six years.

Please note that if you instruct us in different areas of work we are required to obtain identification data from you again.

Accordingly, for example, if we carry out conveyancing work for you and you then ask us to prepare a Will, you need to provide the ID again.

ID documents which are collected for the purposes of client due diligence under the 2017 Money Laundering Regulations must be retained for a minimum of 5 years but not more than 10 years from the date of completion of the transaction. All our files are securely shredded at the appropriate time.

Any client has the right to request that their data is deleted or amended and has the right to access any data we hold. However any request for deletion will be considered in the light of our professional responsibilities detailed above.

You will find more information on the website for the Information Commissioners Office <https://ico.org.uk>.