

PRIVACY POLICY

Data Protection Officer – David Seals

Version 1

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PRIVACY POLICY

Downs Solicitors LLP is committed to managing your personal data securely. We will only keep the personal data required to undertake our business processes and will only share or transfer the data you provide to us for the purposes outlined below. We will always provide you with the ability to opt-out of electronic direct marketing communications and to provide you with options to select regarding which news and information you receive from us.

Our Data Protection policy and procedures have been developed in line with the requirements of the UK GDPR and Data Protection Act 2018.

What personal data we may collect about you

We collect and process personal data about you when you interact with us, including when you seek legal advice from us, use our website, sign up to our newsletters or attend seminars and events, or agree to provide services to us. We may also collect personal data about you in order that we can check and verify your identity. The personal data we process may include:

- your name, date of birth, passport or driving licence details.
- Your National Insurance number and tax details.
- Your home or work address, email address and/or phone number (mobile and/or landline).
- Your job title.
- Your bank or building society details, including any billing addresses.
- Your employment status, including details of your salary and benefits where you instruct us on a matter related to your employment or in which your employment status or income is relevant.
- Details of your spouse/partner and dependants or other family members eg where you instruct us on a family matter or a will
- Details of your pension arrangements eg if you instruct us in relation to financial arrangements following a relationship breakdown.
- Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs eg if you instruct us in connection with a discrimination claim.
- Your IP address and information related to the browser or device you use to access our website and other analytics data.
- any other information you may provide about yourself, whether directly or via your legal representatives.

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

We will store data we receive from you, your legal counsel or other advisors, data that is publicly available and data from third parties such as our client onboarding provider.

Why do we use your personal data?

Under data protection law, we can only use your personal data if we have a genuine reason for doing so. For example:

- 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 such a contract
- for our legitimate interests or those of a third party
- where you have given us your consent.

Examples of legitimate interests includes:

- Managing and protecting our business and financial interests and legal rights, including but not limited to use in connection with legal claims, compliance, regulatory, conflict and due diligence checks.
- Operational reasons such as monitoring our financial performance, improving efficiency, training and quality control.
- The provision of legal advice to our clients and for the establishment, exercise or defence of legal rights or claims, which may include alternative dispute resolution processes on behalf of our clients in accordance with the legitimate interests of our clients and Downs Solicitors LLP.
- Managing our relationship with you.
- Managing risk for Downs Solicitors LLP.
- Responding to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests which includes investigating any complaints received from you or from others about our website or our services.
- Using the information that you provide to us to personalise our communications and services to you.
- Monitoring the use of our website and to use your information to help us check, improve, promote and protect our content, services and website, both online and offline.

We may also send you direct marketing in relation to our relevant services or other services provided by us. You can opt-out of electronic direct marketing and to select your preferences for receiving news and information by following the instructions in the relevant communication. Alternatively, you can email our Marketing Manager, Claire Peers – c.peers@downslaw.co.uk

Who do we share your personal data with?

We may share the personal data you provide to us with the third parties listed below where this is necessary for legal or regulatory reasons and to enable us to provide our services to you and to undertake our business processes. These third parties may include:

- our external auditors and accountants.
- Barristers, solicitors, other legal representatives and experts engaged in your matter.
- Our external suppliers, including IT service suppliers and cloud platform service providers.
- Regulatory bodies and/or law enforcement agencies if required by law or if necessary for the legal protection of our legitimate interests in compliance with applicable laws.

We will not share your information with other organisations for marketing, market research or commercial purposes.

How long will we keep your personal data?

In most cases we retain your personal data for seven years after your matter is finished. We keep your personal data after we have finished advising or acting for you for one of the following reasons:

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

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

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

Where will we store your data?

The personal data that we collect from you is mainly stored on our own secure system. Some data may be held by cloud provider platforms. It is not transferred to or stored outside the European Economic Area (EEA).

We ensure that the confidentiality and protection of all data is preserved through compliance with legal requirements.

If you would like further information, please contact our Data Protection Officer, David Seals – see below under 'How to get in touch with us'.

What are your rights in relation to your personal data?

You have the right to ask us not to process your personal data for direct marketing purposes. You can exercise your right to prevent such processing by clicking the unsubscribe button on any communication we have sent to you or by contacting our Marketing Manager.

You can withdraw your consent to us using your personal data at any time subject to our right to retain and use your data for purposes allowed by law as set out above under 'Why do we use your personal data?'

If the information we hold about you is inaccurate or incomplete, you can ask us to update it.

You also have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data if it is no longer necessary for us to use your personal data, where you object to the use of your personal data and we don't have a good reason to continue to use it, or we haven't handled your personal data in accordance with our obligations.

How do we keep your personal data secure?

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

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

How to complain

Our Data Protection Officer should be able to resolve any query or concern you may have about our use of your information. However, you also have the right to complain to the Information Commissioner (the supervisory authority in the UK) - <https://ico.org.uk/your-data-matters/raising-concerns/>

How to get in touch with us

If you have any queries or concerns you can contact us as follows:

- Email: d.seals@downslaw.co.uk
- In writing: David Seals, Data Protection Officer, Downs Solicitors LLP, 156 High Street, Dorking, Surrey, RH4 1BQ

- Telephone: 01306 880110.

Changes to this Privacy Policy

This privacy policy may be amended from time to time.

A copy of is also available on our website – www.downslaw.co.uk.