

PICTONS SOLICITORS LLP PRIVACY POLICY – PERSONAL CLIENTS

In this Privacy Policy the terms, 'we' or 'us' is Pictons Solicitors LLP.

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. We are the “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required to notify you of the information contained in this Privacy Policy.

We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number Z544343.

Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

What information we collect

We process personal information which you give us or which has been provided from third parties on your instructions:

- As a client to provide you with legal services
- Whilst servicing your account through our website, in writing or over the phone
- If you request information or assistance from us

What personal information we process

This includes:

- Personal details such as your date of birth, address, gender, National Insurance Number, telephone number and email address
- Identity information such as your passport, driving licence, utility bills or national identity card
- Credit history and records relating to you, your partner or anyone else you are financially linked with (we obtain this information from credit reference and fraud prevent agencies)
- Family, lifestyle, financial, business activities and social circumstances
- Financial details such as your income, taxation and information about your bank accounts and other financial related details
- Investments and other financial interests
- Employment/self-employment details

Where we need to process personal data to provide our services, we ask that you provide other data subjects who you tell us about, such as family members about its use.

Special categories of personal data

Special categories of personal data are more sensitive personal information which requires a higher level of protection. This would include information about race, ethnicity, religious belief, philosophical belief, sexual orientation, political opinions, physical or mental health, genetic data, biometric data, sick or statutory leave, and information about criminal convictions and crime.

We do not generally process such information unless you have voluntarily provided this to us, or it is relevant to the legal service you have asked us to provide you with. We will process sensitive information where you have provided this information to us and have agreed that we can use this information to deliver products and services to you. Where possible we shall seek to minimise the collection and use of such special categories of personal data.

How we use your information

We use your information to:

- Provide legal services to you
- Provide and service your relationship with us
- Comply with legal obligations for the prevention of financial crime and money laundering
- Administer, manage and develop our business services
- Manage security, quality and risk
- Provide you with information about us and our range of services
- Comply with any legal or regulatory requirements or practice standards issued by any professional body of which we are a member

We will process your information in order to meet our contractual obligations to you, were have a legitimate interest to do so, where we are permitted by law or to comply with applicable laws and regulation.

Purpose	Legal Basis
Providing a service and internal processing	
To assess your needs and provide you with suitable products and services	<p>Contractual obligation to provide you with, a proposal including a costs estimate and upon instruction to confirm those instructions and progress your matter to a conclusion</p> <p>Where special categories of personal data are processed, this is with your consent to assess your needs, or progress your matter</p>
To service and administer your matter including billing	Legitimate interests to provide and manage the service
To verify the identity of our clients	To comply with legal obligations to prevent money laundering
To confirm, update and improve our client records	To comply with legal obligations in the Data Protection legislation
To provide you with any information on the services that you have requested	To meet our contractual obligation to provide information on the services you have requested

Relationship management

To manage and develop our relationship with you	Legitimate interests to service your matter and improve our service to you
To inform you of products and services that may be of interest to you, where you have chosen to be made aware of this	With your consent

Training and development

For training purposes and to improve our service to you	Legitimate interests to improve our services and develop our employees
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Complying with legal, regulatory or professional obligations

To prevent, investigate and prosecute crime, fraud and money laundering	To comply with legal obligations for prevention of financial crime and money laundering
For auditing purposes in respect of our Regulatory obligations, Quality Standards and Accreditations	To comply with our legitimate interest to conduct audits
If we are obliged to disclose information by reason of any law, regulation or court order	To comply with legal obligations
For security risk and management purpose provided in accordance with our obligations	To comply with legal obligations for prevention of financial crime and money laundering
	To comply with legal obligations under the Data Protection legislation
	To comply with legal obligations
	To comply with legitimate interests

Other

To transfer information to any entity which may acquire rights in us	Legitimate interests for commercial interests
For any other purpose to which you agree	With your consent

How we retain your personal information

We will retain your personal information in accordance with applicable laws and for as long as is necessary for the purpose for which it was collected. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set out above.

In the absence of any specific legal, regulatory or contractual requirements our retention periods are:

Type of Personal Information	Retention Period
General personal data which includes your normal personal data, personal identity, personal financial data and supporting documents	Conveyancing and other matters involving land and specialities: either (a) 6½ years after the end of our business relationship with you; or (b) 12½ years after the end of your matter, whichever comes later
Special categories of personal data	Wills: Indefinitely All other matters: 6½ years after the end of our business relationship with you, or the end of your matter whichever comes later
CCTV – digital images if you visit our offices	90 days

How we share your information

Where necessary or required we share information with:

- Regulatory authorities to comply with our legal obligations.
- Credit reference agencies to check your identity in accordance with our legal obligations.
- Property search companies to identify any issues that might influence your decision to buy or sell a property.
- Insurers for the purpose of providing you with appropriate financial cover for an identified insurable risk, or in connection with any claim made by you against us.
- Property agents, brokers, lenders, other solicitors involved in your transaction representing another party or parties in your matter to enable them and us to fulfil our obligations to you.
- Law enforcement or other regulatory or government agencies or HMRC, Companies House, Probate Registry, Court of Protection or HM Land Registry or the courts or tribunals to fulfil your and our legal obligations.
- Experts, consultants and barristers required to work on your matter.
- Our auditors and other professional advisers
- External assessment bodies to achieve and maintain any regulatory or quality assurance standards and accreditations which meet our legal obligations and enable us to provide quality legal services to you.

Information security

We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

Updates

We will keep this Privacy Policy under review and make updates from time to time. Any minor changes to this Privacy Policy will be posted on this page and we will communicate any major changes to you.

This privacy policy was updated on 19 July 2019.

Cookies

Our website uses cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our Website). You can find more information about our use of cookies on our Cookies page.

Your rights

You have the right to request copies of your personal information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased. You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop or place restrictions on the processing of your personal information and/or to withdraw your agreement to processing based on "consent", but this does not apply where we have other legal justifications to continue processing your data or an overriding legitimate interest. You can also ask us to transfer your personal information to a third party.

In relation to all of these rights, please contact us using the details below.

Complaints process

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate and respond to your complaint. You also have the right to complain to the Information Commissioner's Office: www.ico.org.uk.

Contact us

In writing: Mr J Gardiner, Data Protection Manager, Pictons Solicitors LLP, 5th Floor, Hampton by Hilton, 42-50 Kimpton Road, Luton, Beds, LU2 0FP.

Email: info@pictons.co.uk Telephone: 0800 302 9448