

TERMS OF BUSINESS PRIVACY NOTICE

Gamlins Solicitors LLP is the Data Controller and/or the Data Processor of any personal information you may provide to the firm. The personal information we collect and hold about you is your privacy information.

This Notice applies to all the registered offices of Gamlins Solicitors LLP, the details of which can be found on its website at: www.gamlins.com

Any queries or complaint about the application of this Notice or any query as to the management of your privacy information should be addressed to Jennifer Edwards who is an Associate Solicitor of Gamlins Solicitors LLP and manages data protection issues on its behalf. Her contact details are Gamlins Solicitors LLP, 14-15 Trinity Square, Llandudno Conwy LL30 2RB e-mail llandudno@gamlins.com or 01492 860420.

Gamlins Solicitors LLP is committed to respecting the privacy of all its clients and third party contacts who may provide personal information to it. Please read the following privacy notice so that:

- you know how we use and protect the personal information that you provide to us or that we obtain or hold about you and
- you understand what your rights are in relation to information that we hold.

If you need any assistance to understand the Notice or have any questions then the member of our team responsible for your matter will be very pleased to help you.

This Policy forms part of the Terms and Conditions of Business for all clients of the firm.

It applies to information about living identifiable individuals only. It applies to all information we hold whether manually or electronically.

What information does Gamlins Solicitors collect about you?

We may collect and process personal information from or about you in the course of our business including when you contact or request information from us or when you engage our legal or other services or when you are providing services to us or to one of our clients. The exact information we hold will depend on what you have asked us to do or what we are contracted to do for you. This may include:

For Money Laundering Checks

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport. This data will be processed only for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your express consent.

For Legal Work

If you make a general enquiry of the firm, seek an estimate of costs for legal work, are provided with free initial advice or become a client of the firm, we will usually need information to confirm your identity e.g. your date of birth, personal detail relevant to your matter and circumstances as well as contact information for you and other parties to the matter.

During the course of any matter where we are acting for you as a client, personal information will be provided to us by or on your behalf or generated by us in the course of representing you and carrying out your legal work.

Our website and services are not specifically aimed at children because in legal work children are generally represented by their parent or guardian. Sometimes the nature of your matter may require that we collect and hold information about your children. You should be aware that privacy information about children enjoys special protection and will be held and processed accordingly. If you are a child and need further advice or explanation about how we would use your information please email Jennifer Edwards.

The information that we need will be explained to you by a member of our team and/or set out in our letter of engagement depending on the nature of your matter.

For Financial Management

Financial Information such as payment related information

From Third Parties

We may also receive information about you from third parties such as estate agents, accountants, banks, surveyors, medical professionals, courts, regulatory bodies and other advisors and specialists related to your matter. Our clients and matter contacts may also provide us with information about you if you are involved in a transaction or dispute with one of our clients or have a connection with them such as being a tenant or employee of a client.

Third parties providing services to the firm may also provide basic personal information such as name, status and contact information.

How do we obtain your information?

- We collect information from you as part of our business acceptance processes and about you and others as necessary in the course of providing legal services.
- We gather information about you when you provide it to us, or interact with us directly e.g. talking or writing to our staff

How do we use this information?

We will use your information for the specific purpose(s) for which it has been provided to or collected by us e.g.:

- to manage and administer our relationship with you
- to provide information that you may request regarding the services that we offer e.g. whether we can assist with certain legal advice
- to provide our legal services to you including referring you to other specialist and third party advisers where appropriate. This information may also be disclosed to third parties to the extent reasonably necessary in connection with that work.
- to comply with our legal, regulatory and risk management obligations
- to contact you for your views on our services
- to update and enhance our client records
- for analysis to help us to manage our practice
- for statutory returns

We also use your information to administer, support, improve and develop our business generally and to enforce our legal rights.

We may also use the information that we collect about you for marketing and hospitality purposes e.g.:

- to provide communications about us and other services we provide that may be of interest to you e.g. sending you newsletters
- to provide you with updates on relevant areas of law and practice
- to contact you about other activities and events that we may undertake
- to invite you to a social event

Information gathered through cookies and similar technologies are used to measure and analyse information on visits to our websites, to tailor the websites to make them better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

What are the grounds which enable us to process your information?

We must have a lawful basis for collecting and processing your information; this will vary on the circumstances of how and why we have your information.

- For any information you may provide to obtain legal advice and/or for the conduct of a legal matter on your behalf: the lawful basis will be "legitimate interests". *This means that the processing by us is necessary for the purposes of our legitimate interests as a regulated business providing legal services to the public or for the legitimate interests of a third party relating to the provision of those services unless there is good reason to protect your personal data which overrides those legitimate interests.*
- For marketing activities: you will sometimes be asked to give explicit consent for us to process your information. It will also however be in the legitimate interests of the firm to use your personal information to invite you to hospitality events or other client events and/or to send you information that we think may be of interest to you or your business.
- For information you provide for money laundering checks: the lawful basis is that the processing is necessary for compliance with a legal obligation to which we are subject e.g. *for us to certify your identity under our anti-money laundering requirements including carrying out electronic ID checks.*

If, in advising and/or acting for you, we need to process any special i.e. sensitive categories of personal information then we must have a further lawful basis for processing. In that situation, the lawful basis for our processing will be:

- the processing being necessary for the establishment, exercise or defence of legal claims. *(by way of explanation sensitive data includes information such as racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, processing of genetic or biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sex life or sexual orientation.)*

There is also special protection for any information which may be provided about children which may be relevant in any matter. Where information is held about any children we will discuss with you the circumstances in which we or you may need to explain to them what information we are holding about them, the reasons for which we are holding this information and their own rights in this regard.

Sharing your information

Some of the information you provide to Gamblins Solicitors will be held on our computers in the UK and will only be accessed by or given to our staff working in the UK. Some of the information you provide to Gamblins Solicitors may be transferred to, stored and processed by third party organisations which process data for us and on our behalf. These third parties may be based or store or process information in the UK or elsewhere including outside of the EEA. As with many law firms, these third parties may include third party IT platforms (including cloud based platforms), suppliers of administrative and support services and suppliers of other specialist products.

We may also share your personal information with trusted third parties in accordance with arrangements the firm has in place with them, including:

- HM Land Registry or HM Revenue and Customs
- Solicitors acting on the other side
- Third parties who assist us in the course of the services we provide to you such as barristers, other professional advisers and case management services
- Our professional advisors and auditors
- Insurance Companies, Claims portal, Certainty
- Suppliers to whom we may outsource certain support services
- IT service providers to Gamlins Solicitors
- Regulatory authorities, courts, tribunals
- Lexcel, APIL, CQS and other accreditation panels

This may also include government agencies and law enforcement agencies where this is required to comply with legal or regulatory requirements including the prevention of crime or terrorism.

Finally, if Gamlins Solicitors merges with another business entity or divests a part of its business or carries out internal corporate restructuring, your information may be disclosed to Gamlins Solicitors' new business partners or owners or the new corporate entities.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy; please see the next section "Protection of your Information" below.

Protection of your information

We have in place administrative, technical and physical measures on our website and internally designed to guard against and minimise the risk of loss, misuse or unauthorised processing or disclosure of the personal information that we hold.

Where we transfer information to third parties to enable them to process it on our behalf, we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure.

We will also ensure that where information is transferred to a country or international organisation outside of the UK / EEA, we will comply with the relevant legal rules governing such transfers.

We keep your personal information no longer than is necessary for the purpose for which it was collected. Information on our document retention policy can be made available on request to Jennifer Edwards whose contact details are provided at the commencement of this Notice.

Your rights

We want you to know that at all times you have the benefit of a number of legal rights in relation to your personal information which we hold, although those rights may not apply in all cases or to all the information that we hold about you. For example, we may need to continue to hold and process information to establish, exercise or defend our legal rights.

You have the right to request that we:

- Provide you with a copy of your personal information that we hold
- Update your personal information where it is out-of-date or incorrect
- Delete personal information that we hold
- Restrict the way in which we process your information
- Consider any valid objections to our processing of your personal information
- Provide information you have given to us to a third party provider of services (where our lawful basis for processing is consent and where processing is automated)

We will respond to your request (including providing information on whether the rights apply in the particular circumstances) within the applicable statutory time period. If we are not sure who you are then we may ask you to provide evidence of identification.

Complaint to the Information Commissioner

You are entitled to make a complaint to the Information Commissioner at any time. You can contact the Information Commissioner's Office via <https://ico.org.uk/> for information, advice or to make a complaint. The telephone number is 0303 123 1113.

We do not intend to process your personal information for any reason other than stated within this Privacy Notice. We constantly review our internal privacy practices and may change this policy from time to time. When we do we will inform you by e-mail.

I give my consent for you to process my personal data in accordance with the above. I understand that I may withdraw this consent at any time.

..... SIGNED DATE

..... Name in Capitals