Jennifer Attrill – Freelance Solicitor

PrivACY POLICY

CONTENTS

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

CLAUSE

[1. Important information and who I am 1](#_Toc256000000)

[2. The personal data I collect about you](#_Toc256000001) 1

[3. How is your personal data collected?](#_Toc256000002) 2

[4. How I use your personal data](#_Toc256000003) 3

[5. Disclosures of your personal data](#_Toc256000004) 5

[6. International transfers](#_Toc256000005) 6

[7. Data security](#_Toc256000006) 6

[8. Data retention](#_Toc256000007) 6

[9. Your legal rights](#_Toc256000008) 6

[10. Contact details](#_Toc256000009) 8

[11. Complaints](#_Toc256000010) 8

[12. Changes to the privacy policy and ymy duty to inform us of changes](#_Toc256000011) 8

[13. Third-party links](#_Toc256000012) 8

Introduction

**PRIVACY POLICY**

I respect your privacy and am committed to protecting your personal data. This privacy policy will inform you as to how I look after your personal data when you visit my website (regardless of where you visit it from), and tell you about your privacy rights and how the law protects you.

**1.** **Important information and who I am**

This privacy policy gives you information about how I collect and use the personal data belonging to you or your personnel in the context of providing legal services to you or your business, through your use of my website and through any of the other ways I interact, as set out in more detail in paragraph 3 below.

My website is not intended for children and I do not knowingly collect data relating to children.

Controller

I am the controller and responsible for your personal data.

1. The personal data I collect about you

Personal data means any information about an individual from which that person can be identified.

I may collect, use, store and transfer different kinds of personal data about you which I have grouped together as follows:

* Identity Data includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
* Contact Data includes billing address, delivery address, email address and telephone numbers.
* Financial Data includes bank account and payment card details.
* Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
* Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
* Profile Data includes your interests, preferences, feedback and survey responses.
* Usage Data includes information about how you interact with and use my website, products and services.
* Marketing and Communications Data includes your preferences in receiving marketing from me and my third parties and your communication preferences.

I also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, I may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with my website to help improve the website and my service offering.

In certain circumstances, my collection of the different categories of data set out above may include the collection of Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs,sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). I also may collect Criminal Convictions and Offences Data.

If you fail to provide personal data

Where I need to collect personal data by law, or under the terms of my engagement with you (as set out in my engagement letter and terms of business), and you fail to provide that data when requested, I may not be able to perform the services set out in the engagement letter.

1. How is your personal data collected?

I use different methods to collect data from and about you including:

* In the process of carrying out work for you (or your business) where I will in almost all instances act as a controller. In very limited circumstances I may act as a processor in which case I will let you know and ensure that an appropriate contract is put in place.
* When I communicate with you by email or other electronic correspondence, by telephone or using video conferencing software. You may give me your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
* make a request for my services;
* subscribe to my publications;
* request marketing to be sent to you;
* complete a survey; or
* provide me with feedback.
* Networking (for example, at in-person or virtual events).
* Otherwise through providing my legal services and operating my business.

I also collect data from and about you via my website:

* Through your actions (for example, when submitting a enquiry form)
* Through automated technologies or interactions. As you interact with my website, I will automatically collect Technical Data about your equipment, browsing actions and patterns. I collect this personal data by using cookies[, server logs] and other similar technologies.
* Through third parties or publicly available sources. I will receive personal data about you from various third parties and public sources.
* Technical Data is collected from analytics providers; advertising networks and search information providers;
* Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
* Identity and Contact Data from data brokers or aggregators;
* Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK;
1. How I use your personal data

**Legal basis**

The law requires me to have a legal basis for collecting and using your personal data. I rely on one or more of the following legal bases:

* **Performance of a contract with you:** Where I need to perform the contract I am about to enter into or have entered into with you.
* **Legitimate interests:** Where it is necessary for my legitimate interests as a legal services provider (or those of a third party) and your interests and fundamental rights do not override those interests. These legitimate interests include my interests in managing my relationship with my clients, prospective clients and their staff, hosting virtual and in-person events and ensuring appropriate standards and compliance with policies, practices or procedures.
* **Legal obligation:** Where I need to comply with a legal obligation to which I am subject.
* **Consent:** I rely on consent only where I have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.
* Where processing of "special category data" is necessary in the context of legal claims or where another legal ground other than explicit consent is available to us under relevant data protection legislation.
* Where my legal services require me to process "special category data" and where I have obtained your explicit consent to do so. If I seek and obtain your consent, you may withdraw it at any time.

Purposes for which I will use your personal data

I have set out below, in a table format, a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what my legitimate interests are where appropriate.

|  |  |  |
| --- | --- | --- |
| **Purpose/Use** | **Type of data** | **Lawful basis [and retention period]** |
| To check whether I can act for you as a new or existing client and carry out all of my regulatory compliance requirements, including conflicts of interest, anti-money laundering, anti-terrorism, sanctions, fraud and background screening | Identity ContactFinancialProfessional | Performance of a contract with youNecessary to comply with a legal or regulatory obligationPublic interestNecessary for my legitimate interests (to detect and prevent the commission of fraud, money laundering and terrorism offences)  |
| To deliver my services to you including engaging service providers, managing payments, fees and charges and collecting and recovering money owed to me | Identity Contact Financial Transaction Marketing and Communications | Performance of a contract with you Necessary for my legitimate interests (to recover debts due to me) |
| To manage my relationship with you which will include notifying you about changes to my terms or privacy policy | Identity Contact Profile Marketing and Communications | Performance of a contract with you Necessary to comply with a legal obligationNecessary for my legitimate interests (to keep my records updated and to study how customers and clients use my products and services) |
| To enable you to complete a survey | Identity Contact Profile Usage Marketing and Communications | Performance of a contract with you Necessary for my legitimate interests (to study how customers and clients use my products and services, to develop them and grow my business) |
| To administer and protect my business and my website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)  | IdentityContactTechnical | Necessary for my legitimate interests (for running my business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)Necessary to comply with a legal obligation |
| To deliver relevant website content to you and measure or understand the effectiveness of the marketing I provide to you | Identity Contact Profile Usage Marketing and Communications Technical  | Necessary for my legitimate interests (to study how customers use my products and services, to develop them, to grow my business and to inform my marketing strategy) |
| To use data analytics to improve my website, products and services, marketing, customer relationships and experiences | Technical Usage  | Necessary for my legitimate interests (to define types of clients and customers for my products and services, to keep my website updated and relevant, to develop my business and to inform my marketing strategy) |
| To make suggestions and recommendations to you about services that may be of interest to you | Identity Contact Technical Usage Profile Marketing and Communications | Necessary for my legitimate interests (to develop my products and services and grow my business) |

Direct marketing

I strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

I may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what I think you may want or need, or what may be of interest to you. This is how I decide which products, services and offers may be relevant for you (I call this marketing).

You will receive marketing communications from me if you have requested information from me or purchased goods or services from me and you have not opted out of receiving that marketing.

Third-party marketing

I will get your express opt-in consent before I share your personal data with any third party for marketing purposes.

Opting out of marketing

You can ask me or third parties to stop sending you marketing messages at any time by contacting me.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes, for example relating to appointment reminders and checking that your contact details are correct.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly.

1. Disclosures of your personal data

I may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which I will use your personal data](#a355763) above.

* Internal Third Parties.
* External Third Parties.
* Third parties to whom I may choose to sell, transfer or merge parts of my business or my assets. Alternatively, I may seek to acquire other businesses or merge with them. If a change happens to my business, then the new owners may use your personal data in the same way as set out in this privacy policy.

I require all third parties to respect the security of your personal data and to treat it in accordance with the law. I do not allow my third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with my instructions.

1. International transfers

I do not transfer your personal data outside the UK

1. **Data security**

I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on my instructions and they are subject to a duty of confidentiality.

1. Data retention

How long will you use my personal data for?

I will only retain your personal data for as long as reasonably necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe there is a prospect of litigation in respect to my relationship with you.

To determine the appropriate retention period for personal data, I consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask me to delete your data: see paragraph 9 below for further information.

In some circumstances I will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case I may use this information indefinitely without further notice to you.

1. Your legal rights

You have rights under data protection laws in relation to your personal data to:

* Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data I hold about you and to check that I am lawfully processing it.
* Request correction of the personal data that I hold about you. This enables you to have any incomplete or inaccurate data I hold about you corrected, though I may need to verify the accuracy of the new data you provide to me.
* Request erasure of your personal data in certain circumstances. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where I may have processed your information unlawfully or where I am required to erase your personal data to comply with local law. Note, however, that I may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
* Object to processing of your personal data where I am relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on my legitimate interests). In some cases, I may demonstrate that I have compelling legitimate grounds to process your information which override your right to object.
* You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see [Opting out of marketing](#a879432) in paragraph 4 for details of how to object to receiving direct marketing communications).
* Request the transfer of your personal data to you or to a third party. I will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where I used the information to perform a contract with you.
* Withdraw consent at any time where I am relying on consent to process your personal data (see the table in section 4 for details of when I rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, I may not be able to provide certain products or services to you. I will advise you if this is the case at the time you withdraw your consent.
* Request restriction of processing of your personal data. This enables you to ask me to suspend the processing of your personal data in one of the following scenarios:
* If you want me to establish the data's accuracy;
* Where my use of the data is unlawful but you do not want me to erase it;
* Where you need me to hold the data even if I no longer require it as you need it to establish, exercise or defend legal claims; or
* You have objected to my use of your data but I need to verify whether I have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact me.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I could refuse to comply with your request in these circumstances.

What I may need from you

I may need to request specific information from you to help me confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. I may also contact you to ask you for further information in relation to your request to speed up my response.

Time limit to respond

I try to respond to all legitimate requests within one month. Occasionally it could take me longer than a month if your request is particularly complex or you have made a number of requests. In this case, I will notify you and keep you updated.

1. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact me in the following ways:

* Email address: jenniferattrillwills@gmail.com
* Telephone number: 07919147060
1. Complaints

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). I would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact me in the first instance.

1. Changes to the privacy policy and your duty to inform us of changes

I keep my privacy policy under regular review.

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your relationship with me, for example a new address or email address.

1. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I do not control these third-party websites and are not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy policy of every website you visit.