

Data & Privacy Notice

Our Privacy Policy

This firm processes your data in accordance with the terms of the Data Protection Act 2018, the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and the relevant provisions relating to the General Data Protection Regulation contained within the European Union (Withdrawal) Act 2018 (UK GDPR). This Data & Privacy Notice explains, in detail, the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe. Unless otherwise indicated, references in this Data and Privacy Notice to the GDPR refer to the UK GDPR.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how our firm uses your data. We hope the following sections will answer any questions you have but if not, please do get in touch with us.

Conditions for Processing Data

We are only entitled to hold and process your data where the law allows us to. The current law on data protection sets out a number of different reasons for which a law firm may collect and process your personal data. These include:

Contractual obligations

The main purpose for our holding your data is to provide you with legal services under the agreement we have with you. This agreement is a contract between us and the law allows us to process your data for the purposes of performing a contract (or for the steps necessary to enter in to a contract). We may also need to process your data to meet our contractual obligations to the Legal Aid Agency where you receive legal aid to fund your case or advice.

Legitimate Interests

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. This may include to satisfy our external quality auditors or our Regulators.

Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity.

Consent

In some situations, we can collect and process your data with your consent. For example, when you tick a box to receive email newsletters. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

When do we collect your data?

We normally collect your data when you provide it to us or when it is provided to us by others (your opponent's solicitors for example) during your case. You may give us your data by email; through an online web form; over the telephone; face to face; or by post.

What sort of data do we collect?

Information you provide to us

You voluntarily give us your personal information for instance when:

- you contact us via our website
- provide a comment on our website
- write a review
- sign up to any newsletters
- interact with us on social media platforms, and/or
- use our services

Where we request information from you we will collect the information set out in the relevant web pages, or as explained to you over the telephone or face to face.

Client services

We collect your name and contact details. This may include asking for and keeping a copy of your passport/driving licence and proof of address.

We may gather details of your age; ethnicity; gender etc. if required to do so by the Legal Aid Agency where you are in receipt of Legal Aid. Where you have Legal Aid, we may also gather financial information from you.

We also collect and hold information about your case or legal problem.

CCTV

We have installed CCTV systems on the outside of our buildings and personal data in form of images or CCTV footage may be recorded.

We operate CCTV in accordance with the ICO CCTV Code of Practice and are processing CCTV data in order to pursue our legitimate interests of:

- promoting a safe working environment and monitoring health and safety at our premises

- monitoring the safety and security of our premises
- deterring and assisting in the prevention, investigation and detection of crime and/or serious breaches of policies and procedures, and
- assisting with the identification and prosecution of offenders, including use of images as evidence in criminal proceedings

CCTV is never used for any automated decision taking.

Images captured by CCTV will not be kept for longer than is necessary and ordinarily, will not be retained for more than 30 days. However, on occasions, there may be a need to keep images for longer such as where a crime is being investigated.

We will only disclose images and audio to other authorised bodies such as the police or other law enforcement agencies for the purposes set out above.

How do we use your data?

We may use your data to notify you of our other services but only where we have your consent to do so.

Provision of services

We only use your data for the purposes of providing you with legal advice, assistance and where appropriate, representation and for reasons directly associated with those services (i.e. providing information to quality auditors; the Legal Aid Agency etc.). In particular:

- to deliver our services
- to manage our relationship and communicate with you
- to provide you with advice or guidance about our services
- to make and manage payments
- to respond to complaints and seek to resolve them
- to train our staff and measure the quality of the service we give to clients

We may use your data to notify you of our other services but only where we have your express consent to do so.

Regulatory

We also use data to communicate with our regulators or legislators and to obey laws, regulations and codes of conduct that apply to us.

Website enhancement and business development

We also use data to develop our business and services. In particular:

- to respond to individual experiences shared with us and for editorial content
- to enhance your online experience
- to conduct research and surveys

- to develop and manage our services including marketing of new or enhanced services
- to research your views and experiences for research and editorial purposes, including through requests for feedback on our services
- to understand your website journey, including what pages you have viewed and for how long
- to administer and keep safe and secure our website and for internal operations, including data analysis, testing, statistical purposes

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

By law, we may not place cookies on your computer without your consent, unless they are strictly necessary to the operation of the service that we provide on the Website.

e.g. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

We use Google Analytics to monitor how our website is being used so we can make improvements. Our use of Google Analytics requires us to pass to Google your IP address (but no other information) - Google uses this information to prepare site usage reports for us, but Google may also share this information with other Google services. In particular, Google may use the data collected to contextualize and personalize the ads of its own advertising network. Related information:

- [Google's privacy policy](#)
- [How Google uses this information](#)

How do we protect your data?

We take protecting your data very seriously. The data you give us may be subject to Legal Professional Privilege and is often extremely sensitive and confidential.

With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it. We have clear data protection and information security policies and procedures in place (along with Regulatory and other legal obligations to keep your data safe) and these are regularly assessed as part of our Quality Standards and compliance processes.

We protect our IT system from Cyber Attack. Access to your personal data is password-protected, and sensitive data is secured by encryption.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

How long will we keep your data?

We only keep your data for as long as is necessary for the purpose(s) for which it was provided. Normally this is for six years after your case or matter ends (enquiries where we do not take on your case are kept for only 18 months).

This is because we are required to keep client files for that period by our Regulator and/or by the SRA. This also protects you should you be unhappy with our services and want to complain or even sue us after your case ends.

For some cases we may decide that it is proper and appropriate to keep data for longer than six years, but we will notify you if we believe that your case falls into this category.

Who do we share your personal data with?

We sometimes share your personal data with trusted third parties. We only do this where it is necessary for providing you legal services or for the effective operation of our legal practice.

For example, we may share your data with barristers; experts; translators; costs draftsmen; process servers; secure file storage and destruction companies; auditors; the company that securely hosts our off-site cloud storage servers.

We apply a strict policy to those recipients or data processors to keep your data safe and protect your privacy. In particular,;

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Where is your data processed?

We may transfer personal data overseas. In particular, we use cloud IT and similar data storage facilities and so we may store, process and transmit data in locations outside the UK. Where a client matter involves obtaining legal or other professional advice from another country, our firm may need to transfer details about the client matter, including personal data, to a third party in that country.

Whenever we transfer any data out of the UK, we ensure a similar degree of protection is afforded to it and treated with the same security measures regardless of location, and in accordance with our internal processes and policies as well as regulatory and legal obligations. In particular, we ensure that at least one of the following safeguards is implemented:

- we will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK by means of an adequacy decision or similar in accordance with UK adequacy regulations or otherwise comply with EU GDPR transfer restrictions, as applicable
- where we use certain service providers, we may use specific contractual provisions which gives personal data the same protection it has within the UK and ensures a similar level of protection to the personal data as if it was processed within the UK, as applicable, and/or
- we will require that any overseas third party to which we disclose personal data to: (a) only use that personal data for the purposes for which it was disclosed (b) use all technical and organisational measures which are reasonable in the circumstances to secure that personal data (c) delete that personal data when it is no longer required, and (d) treat that personal data in accordance with this Data and Privacy Notice and the appropriate data privacy law.

What are your rights?

You have rights under the GDPR and these include the right to be informed what information we hold about you. In particular, you have the right to request:

- access to the personal data we hold about you – commonly referred to as a ‘data subject access request’, this is free of charge in most cases
- the correction of your personal data when incorrect, out of date or incomplete
- that we stop or restrict any consent-based processing of your personal data after you have withdrawn consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end
- the deletion all your personal information in certain circumstances, for instance, if the information is no longer necessary for the purposes for which it was collected

You also have the right to request a copy of any information about you that we hold at any time.

If we choose not to action your request, we will explain to you the reasons for our refusal.

For further details on your rights, please visit the Information Commissioner’s Office at <https://ico.org.uk/your-data-matters/>

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We

must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Contact Details

For information on how your information is used, how we maintain the security of our information, and to exercise your rights to access information we hold on you, please contact us. Similarly, if you believe that the information we hold is wrong or out of date, please let us know and we will update it. The person in this firm responsible for data protection is our Data Protection Officer, Anthony Penman, Senior Partner insert name and enquires and requests can be sent to her/him by telephone 0161 480 6551, by emailing apenman@alfrednewton.com or in writing to 43-51 Wellington Road South, Stockport SK1 3RX

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this policy. You should exercise caution and look at the privacy statement or policy applicable to the website in question.

The Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling [0303 123 1113](tel:03031231113).

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)