

PRIVACY POLICY

INTRODUCTION

Your Privacy is important to us. This statement sets out how we use your personal data.

As an essential part of our business, we collect and manage client and non-client data. In doing so, we observe the UK data protection legislation and are committed to protecting and respecting clients' and non-clients' privacy and rights. Specifically we act as a "Data Controller" in respect of the information gathered and processed by us.

This Statement describes the ways in which we collect, manage, process, store and share information about you as a result of you being our client and also provides you with information about how you can have control over the use of your data.

If you have any comments or queries regarding our use of your data please contact our Data Protection Officer Teresa M Cornwell.

WHAT INFORMATION DO WE COLLECT ABOUT YOU

In general terms we seek to collect information about you so that we can:

- Administer our relationship with you, provide services and respond to enquiries
- Deliver requested information to you about our services
- Ensure the billing of any procured services and obtain payment
- Process and respond to any complaints
- Meet our legal and other regulatory obligations imposed on us

The information that we need for these purposes is known as your "personal data". This includes your name, home address, email address, telephone and other contact numbers and financial information. We collect this in a number of different ways. For example, you may provide this data to us directly, online or over the telephone, or when corresponding with us by letter.

We also process sensitive classes of information that includes:

- Physical or mental health details and
- Racial or ethnic origin

We will seek your permission if we need to record any of your sensitive personal data on our systems.

HOW WILL WE USE THIS INFORMATION?

We use the data collected from you for the specific purposes listed in the table below. Please note that this table also explains:

The legal basis for processing your data, linked to each processing purpose; and
In what circumstances your data will be shared with a third party organisation

PURPOSE FOR PROCESSING DATA	LEGAL BASIS FOR PROCESSING DATA	THIRD PARTY ORGANISATIONS WITH WHOM DATA IS SHARED
To administer our relationship with you, provide services and respond to enquiries	To meet the requirements of a contract	None
To ensure the billing of any procured services by you and obtain payment	To meet the requirements of a contract	Government VAT and tax inspectors, external auditors, internal auditors
To provide enquirers support by telephone	To fulfil contractual obligations. This includes taking action before entering into a contract	None
To process and respond to complaints	To meet a legal obligation	Legal Ombudsman SRA

YOUR RIGHTS

Under the terms of data protection legislation, you have the following rights

RIGHT TO BE INFORMED

This Statement fulfils our obligation to tell you about the ways in which we use your information

RIGHT TO ACCESS

You have the right to ask us for a copy of any personal data that we hold about you. This is known as a "Subject Access Request". Except in exceptional circumstances (which we would discuss and agree with you in advance), you can obtain information at no cost. We will send you a copy of the information within 30 days of your request.

To make a Subject Access Request please write to our Data Protection Officer at Teresa M Cornwell Solicitor, 37 Station Road West, Oxted, Surrey, RH8 9EE.

RIGHT TO RECTIFICATION

If any of the information that we hold about you is inaccurate, you can either:

- Contact us on 01883 712721
- Contact our Data Protection Officer at Teresa M Cornwell, 37 Station Road West, Oxted, Surrey, RH8 9EE

RIGHT TO BE FORGOTTEN

From 25 May 2018 you can ask that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days. For further information please contact our Data Protection Officer at Teresa M Cornwell Solicitor, 37 Station Road West, Oxted, Surrey, RH8 9EE

RIGHT TO OBJECT

You have the right to object to:

- The continued use of your data for any purpose listed in section 3 above for which consent is identified as the lawful basis for processing i.e. you have the right to withdraw your consent at any time.
- The continued use of your data for any purpose listed in section 3 above for which the lawful basis of processing is that it has been deemed legitimate

RIGHT TO RESTRICT PROCESSING

If you wish us to restrict the use of your data because (i) you think it is inaccurate but this will take time to validate (ii) you believe our data processing is unlawful but you do not want your data erased (iii) you want us to retain your data in order to establish exercise or defend a legal claim or (iv) you wish to object to the processing of your data but we have yet to determine whether this is appropriate please contact our Data Protection Officer at Teresa M Cornwell Solicitor, 37 Station Road West, Oxted, Surrey, RH8 9EE

RIGHT TO DATA PROTABILITY

If you would like to move, copy or transfer the electronic personal data that we hold about you to another organisation please contact our Data Protection Officer at Teresa M Cornwell Solicitor, 37 Station Road West, Oxted, Surrey, RH8 9EE

IS THE PROCESSING OF INFORMATION LIKELY TO CAUSE INDIVIDUALS TO OBJECT OR COMPLAIN?

Teresa M Cornwell is not aware of any justifiable reasons that would constitute a legitimate reason for objecting or complaining about the way we process or control information

HOW LONG WILL WE RETAIN INFORMATION FOR?

Teresa M Cornwell will typically retain information for a period of six years. This is due to regulatory reasons and to ensure our business records are adequate to maintain the requisite levels of insurance to protect our clients and non-clients.

OVERSEAS TRANSFERS

None of the information that we collect process or store is transferred outside of the European Economic Area (EEA) except to enable processing of payments to overseas bank accounts through our bankers HSBC. This includes information that is exchanged with any third party organisation as described above.

DATA PRIVACY AND SECURITY

All information you provide to us is stored on our secure server protected by an inbuilt firewall. We also have anti-virus product on all our computers. We will keep your information confidential in accordance with all applicable laws. We are however unable to guarantee the security of your information provided via the internet as the internet is not completely secure. Any transmission is at your own risk. Once we have received your information we will do our best to protect your personal data.

GENERAL

Questions and comments regarding this Privacy Notice are welcomed and should be sent to our Data Protection Officer at Teresa M Cornwell Solicitor, 37 Station Road West, Oxted, Surrey, RH8 9EE.

Alternatively you can write to Teresa M Cornwell Solicitor, 37 Station Road West, Oxted, Surrey, RH8 9EE.

You can also contact our Data Protection Officer if you have any concerns or complaints about the way in which your personal data has been handled.

Alternatively you have the right to lodge a complaint with the Information Commissioner's Office who may be contacted at Wycliffe House, Water Lane, Wilmslow, SK9 5AF. ico.org.uk/global/contact-us