

Privacy Policy

Please read the following information carefully. This privacy policy contains information about what data we collect and store about you and why. It also tells you who we share this information with, the security mechanisms we have put in place to protect your data and how to contact us if you have a complaint. This policy is applicable when you enter into a contract with us to purchase family law legal services or to supply us with products and services (whether on behalf of an organisation or personally), make payment to us, make an enquiry to us, visit our website at www.purcellsolicitors.co.uk (regardless of where you visit it from) or otherwise.

Who we are

Purcell Solicitors of The Stables, Brooklands Farm, Newport Road, Broughton, MK16 0HU (being our registered office) collects, uses and is responsible for personal data about you. When we do this, we are the 'controller' of this information for the purposes of the General Data Protection Regulation and other applicable data protection laws.

Purcell Solicitors respects your privacy and is committed to protecting your personal data and we have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this privacy notice namely Pauline Purcell. Pauline can be contacted at the above address or by email on pauline@purcellsolicitors.co.uk

The data we collect about you

When carrying out our family law legal services following you entering into a contract with us to purchase family law legal services or to supply us with products or services (whether on behalf of an organisation or personally), make payment to us, make an enquiry to us, visit our website at www.purcellsolicitors.co.uk (regardless of where you visit it from) or otherwise, we collect, use, store and transfer different kinds of personal data about you following personal data that you provide to us as follows:

- Identity Data including first name, middle name(s), maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, company name and job title.
- Contact Data including billing address, delivery address, email address and telephone numbers.
- Financial Data including bank account(s), payment card details, insurance and pension details.
- Transaction Data including details about payments to and from you and other details of legal services you have purchased from us or products or services you have supplied to us.
- Technical Data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and systems.

- Profile Data including your username and password, purchases or orders made by you or with you, your interests, preferences, feedback and survey responses.
- Usage Data including information about how you use our website and legal services.
- Marketing and Communications Data including your preferences in receiving marketing from us and our third parties and your communication preferences.
- Special Categories of Personal Data including race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic, biometric data and criminal convictions.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature on our website and in order to help us to develop our website and services in the future. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy policy.

We may also provide such aggregate information to third parties. These statistics will not include information that can be used to identify you.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and, you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with family law legal services). In this case, we may have to cancel a contract you have with us but we will notify you if this is the case at the time.

How is your personal data collected

We may use different methods to collect data from and about you including through:-

- Direct Interactions – you may give us your Identity, Contact, Financial and Special Categories of Personal Data by corresponding with us by post, phone, email or otherwise. This can include personal data that you provide when you:-
 - ❖ apply for our legal services or to supply us with products or services;
 - ❖ subscribe to our service or publications;
 - ❖ make an enquiry with us
 - ❖ enter a competition, promotion or survey; or

❖ give us some feedback.

- Automated technologies or Interactions – As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources – We may receive personal data about you from various third parties and public sources.

We may also record phone conversations we have with you.

Information collected from other sources

We collect the following information from other sources:-

CAFCASS for disclosure records and information - Special Categories of Personal Data

Child Maintenance Service for maintenance information – Financial Data

Companies House for company data and information – Identity Data

Court and Tribunal system for court and tribunal records and information - Special Categories of Personal Data

Experian for Credit searches – Financial Data

Financial Institutions e.g. Banks, Mortgage Lenders, Accountants and Financial Advisors for financial data – Financial Data

HM Land Registry for property information – Contact Data

Insurance companies for insurance information – Financial Data

Local Authorities for disclosure records and information - Special Categories of Personal Data

NHS for Medical records and information - Special Categories of Personal Data

Schools for welfare information - Special Categories of Personal Data SmartSearch for electronic identification verification – Identity Data

Police for records and data - Special Categories of Personal Data.

Please note that the above list includes other sources with whom we may collect information from but is not limited to.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We gather this information to allow us to provide the services requested and to provide you with information about our services all activities associated with a law firm. The relevant information is then used by us to communicate with you on any matter relating to the conduct of your instructions in general. If you agree, we may also contact you about other products and services we think may be of interest to you.

In general we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

On the next page of this policy we provide a description of all the ways we envisage using your personal data, and which of the legal basis we rely on to allow us to do this. We also recognise what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been shown in the information on the next page.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a prospective new client	Identity, Contact and Financial	Performance of a review of entering into a contract with you or a third party
To register you as a new client, supplier or other contract	identity, Contact and Financial	Performance of a contract with you or a third party
To process and deliver your instructions including: Manage payments, fees and charges and Collect and recover money owed to us	Identity, Contact, Financial, Transaction, Marketing and Communications	Performance of a contract with you and/or Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you and this includes: Notifying you about changes to our terms and conditions or privacy policy and/or Asking you to provide feedback about our service or take a survey	Identity, Contact, Profile, Marketing and Communications	Performance of a contract with you, Necessary to comply with a legal obligation and/or Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To enable you to partake in a prize draw, competition or complete a survey	Identity, Contact, Profile, Usage, Marketing and Communications	Performance of a contract with you, and/or Necessary for our legitimate interests (to study how clients use our services allowing us to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, Contact and Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise and/or Necessary to comply with a legal obligation)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity, Contact, Profile, Usage, Marketing and Communications and Technical	Necessary for our legitimate interests (to study how clients use our legal services, to develop them, and grow our business and to inform of our marketing strategy)
To use data analytics to improve our website, legal services, marketing, client relationships and experiences	Technical and Usage	Necessary for our legitimate interests (to define types of clients for our legal services, to keep our website updated and relevant, to develop our business and to inform of our marketing strategy)
To make suggestions and recommendations to you about legal services or other services that may be of interest to you	Identity, Contact, Technical, Usage and Profile	Necessary for our legitimate interests (to develop our legal services and grow our business)

Marketing and Promotions

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

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services, offers and other information (such as in respect of events we may run or news updates we may provide) may be relevant for you (this is what we call marketing).

You may receive marketing communications from us if you have requested information from us, purchased family law services from us or supplied products or services to us, or if you provided us with your details when you entered a competition or registered for a promotion. In each case, you will only receive such marketing if you have opted-in to receive that marketing and have not subsequently opted-out of receiving that marketing.

We will also get your express opt-in consent before we share your personal data with any company outside the firm for marketing purposes.

We may use cookies to monitor how people use our website. This helps us to understand how our clients and potential clients use our website so we can improve this in the future.

Who will we share your personal data with

We may have to share your personal data with the following third parties and for the purposes stated in the “Purposes for which we will use your personal data” above:-

- Law enforcement agencies if required by applicable law.
- Professional advisers acting as processors or joint controllers including solicitors /lawyers, accountants/auditors, bankers, marketing advisers, human resources advisers and insurers who provide consultancy, banking, legal, marketing, human resources, insurance, accounting services, process servers, pension, mortgage and financial advisers and barristers.
- Service providers acting as processors.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

We do require all third parties to respect the security of your personal data and to treat it in accordance with the law. We would not allow any third party service providers to us to use your personal data for their own purposes and would only permit them to process your personal data for

specified purposes and in accordance with our instructions. We would also ask them to respect your rights and allow you to exercise your rights against either controller in respect of joint controllers.

Transfer of your information outside the European Economic Area (EEA)

We do not knowingly transfer your personal data outside the EEA or to an international organization. However, some external third parties may run their operations outside of the EEA. These countries do not have same data protection laws as the United Kingdom and EEA. However, in the event of any transfer that we are aware of we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection laws. By submitting your personal data to us you agree to this transfer, storing or processing at a location outside of the EEA.

How long will we store your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal accounting, or reporting requirements.

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

Details of retention periods for different aspects of your personal data are available from us by request. Please be aware that, by law we have to keep basic information about our clients and suppliers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being client and suppliers for tax purposes.

In some circumstances you can ask us to delete your data. Please see below for further information.

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

Consent

Whenever you give us personal data, you are consenting to its collection and use in accordance with this privacy notice, including our use of cookies. If you give us personal data on behalf of someone else, you are confirming that you have given them the information in this privacy notice and that they have agreed for us to use their personal data in the way we describe in this privacy policy.

Your Rights

Under the General Data Protection Regulation, you have a number of important rights that you can exercise free of charge. In summary, these rights are:

- Transparency over how we use your personal data and fair processing of your information;
- Access to your personal data and other supplementary information;
- Require us to correct any mistakes or complete missing information we hold on you;
- Require us to erase your personal data in certain circumstances;
- Receive a copy of the personal data you have provided to us or have this information be sent to a third party, this will be provided to you or the third party in a structured, commonly used and machine readable format;
- Object at any time to processing of your personal data for direct marketing;
- Object in certain other situations to the continued processing of your personal data;
- Restrict our processing of your personal data in certain circumstances;
- Request not to be subject to automated decision making which produce legal effects that concern you or affect you in a significantly similar way;

If you want more information about your rights under the GDPR please see the Guidance from the Information Commissioner's Office on Individual rights under the GDPR or by clicking the link here <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulationgdpr/individual-rights/>

If you want to exercise any of these rights, please:

- Email, call or write to our Data Protection Manager
- Provide another information so that we can identify you
- We may need to contact you to request further information to verify your identity;
- Let us have proof of your identity and address;
- State the right or rights that you wish to exercise;

We will respond to you within one month from when we receive your request.

How to make a complaint

The General Data Protection Regulation (GDPR) also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where the alleged infringement of data protection laws occurred. The UK supervisory authority is the Information Commissioner's Office (ICO) who can be contacted by telephoning 0303 123 1113 between the hours of 9:00 am and 4:30 pm Monday to Friday or at <https://ico.org.uk/concerns/>

We would appreciate the opportunity to deal with your concerns before you approach the ICO and would ask that you contact our Data Protection Manager in the first instance. Please contact us if you have any concerns (see "who we are" above) for the contact details.

Third-party links on our website

Our 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Automated decision making

We do not use automated decision making.

Our Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we 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 our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Future Processing

We do not intend to process your personal data for any reason other than stated within this privacy notice. If this changes, we will inform you either in writing or by email.

Changes to this privacy policy

This privacy notice was published and last updated in May 2018.

We constantly review our internal privacy practices and may change this policy from time to time. When we do we will update this on our website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Get in touch

If you have any questions about this privacy notice or the information we hold about you, please contact us (see “who we are” above) for the contact details.

Alternative formats

If it would be helpful to have this notice provided in another format (for example: in another language, audio, braille) please contact us (see ‘Get in touch’ above).