

# Privacy Notice - Contacts and Non-Clients

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to the GDPR, other relevant UK and EU legislation and, where applicable, our professional duty of confidentiality.

This Notice is intended for recipients who are NOT clients of Ramsdens Solicitors LLP. Clients are referred to our separate Privacy Notice for Clients, a copy of which can be found on our website, or on request by email at dataprotection@ramsdens.co.uk.

#### Key terms

It would be helpful to start by explaining some key terms used in this notice:

We, us, our	Ramsdens Solicitors LLP, also trading as Ramsdens Solicitors
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership
	Genetic and biometric data
	Data concerning health, sex life or sexual orientation

For the purposes of the Data Protection Act 2018 and the GDPR, Ramsdens Solicitors LLP is the data controller of your personal information and is entered in the Information Commissioner's Office (ICO) Register of Data Controllers under registration number Z5358378.

### Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of communicating with you.

Personal data we may collect depending on why and how you have contacted or been in communication with us

Your name, address and telephone number

Electronic contact details, e.g. your email address, web presence and mobile phone number

Information relating to a matter in which you may seek our advice or representation Information about your use of our website

Details of your employment, business ownership or position in your business entity Your photographic image

### How your personal data is collected

We collect most of this information from you directly. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.: a mutual acquaintance; Note that we do not purchase or rent personal data lists or databases.
- via our website we use cookies on our website (for more information on cookies, please see the relevant section of our website, ramsdens.co.uk
- via our information technology (IT) systems, e.g.: automated monitoring of our websites and other technical systems, such as security CCTV at some of our locations, communications systems, email and social media platforms;
- How and why we use your personal data
- Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:
- to comply with our legal and regulatory obligations;
- to take steps at your request before entering into a contract with you;
- for our legitimate interests; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide legal services to you, if you have requested this	For the performance of our contract with you or to take steps at your request before entering into a contract
To communicate with you, and provide to our client material produced by you, where we provide legal services to our client, where you are involved in the case as, for example, an expert witness, an advocate or litigation friend	For the performance of our contract with our client
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures
Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can in delivering services and marketing, and maximising market position
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you
	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to clients

Marketing our services to:

- existing and former clients;
- third parties who have previously expressed an interest in our services;
- third parties with whom we have had no previous dealings.

For our legitimate interests, i.e. to promote our business to existing and former clients

The above table does not apply to special category personal data, which we will only process with your explicit consent.

### Who we share your personal data with

As you are not a client, it is unlikely that we will share your data with any other party than our IT partners, website developers and/or automated marketing platform.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### Marketing communications

Depending on our reason for engaging with you, we may use your personal data to send you updates (by email, telephone or post) about legal developments that might be of interest to you and/or information about our services.

We have a legitimate interest in processing your personal data for promotional purposes (see above 'How and why we use your personal data') and certain regulations mean that we are able to provide certain business contacts with electronic marketing communications. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations outside Ramsdens Solicitors LLP for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us by email on dataprotection@ramsdens.co.uk
- Using the 'unsubscribe' link in emails

 Writing to the Marketing Manager at: Ramsdens Solicitors LLP, Oakley House, 1 Hungerford Road, Edgerton, Huddersfield, HD3 3AL.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

### Where your personal data is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with').

### How long your personal data will be kept

We will keep your personal data while ever it is apparent that we may be able to provide services to you, or you may be interested to receive news and communications from us.

Data related to cookies will be retained in accordance with our Website terms of use, which can be found on our website.

We will not retain your data for longer than necessary for the purposes set out in this Notice.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

### Your rights

You may have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data - in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations
To object	The right to object:

	at any time to your personal data being processed for direct marketing (including profiling);
	in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation</u>.

If you would like to exercise any of those rights, please email, call or write to us - see 'How to contact us'; and

- let us have enough information to identify you (e.g. your full name, address and any client or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

### Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <a href="https://www.getsafeonline.org">www.getsafeonline.org</a>. Get Safe Online is supported by HM Government and leading businesses.

### How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The <u>General Data Protection Regulation</u> also gives you 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 any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a> or telephone 0303 123 1113.

## Changes to this privacy notice

This privacy notice was published on 17 May 2018 and has been updated since.

We may change this privacy notice from time to time, when we do we will inform you via email or letter.

#### How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy notice or the information we hold about you.

Our contact details are shown below:

Jonathan Cornes,

Ramsdens Solicitors LLP,

Oakley House, 1 Hungerford Road,

Edgerton,

Huddersfield HD3 3AL

Email: dataprotection@ramsdens.co.uk

Telephone: 01484 821500