

Privacy Notice - Client

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 collect and use your personal data, we are regulated under the UK General Data Protection Regulation (UK 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 your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

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. We are authorised and regulated by the Solicitors Regulation Authority under number 440420.
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 data Biometric data (where used for identification purposes) 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 advising and/or acting for you.

Personal data we will collect	Personal data we may collect depending on why you have instructed us
Your name, address and telephone number Information to enable us to check and verify your identity,	Your National Insurance and tax details Your bank and/or building society details Details of your professional online presence, e.g., LinkedIn profile

Personal data we will collect	Personal data we may collect depending on why you have instructed us
<p>e.g., your date of birth or passport details</p> <p>Gender and pronoun preferences</p> <p>Occupation</p> <p>Marital status</p> <p>Electronic contact details, e.g., your email address and mobile phone number</p> <p>Information relating to the matter in which you are seeking our advice or representation</p> <p>Information to enable us to undertake a credit or other financial checks on you</p> <p>Your financial details so far as relevant to your instructions, e.g., the source of your funds if you are instructing on a purchase transaction</p> <p>Payment details (including card or bank information for transfers and direct debits)</p> <p>Information about your use of our IT, communication and other systems, and other monitoring information, e.g., if using our secure online client portal</p>	<p>Details of your spouse/partner and dependants or other family members, e.g. if you instruct us on a family matter or a will</p> <p>Your employment status and details including salary and benefits, e.g. if you instruct us on matter related to your employment or in which your employment status or income is relevant</p> <p>Criminal records data, including driving or other convictions.</p> <p>Your nationality and immigration status and information from related documents, such as your passport or other identification</p> <p>Details of your pension arrangements, e.g. if you instruct us on a pension matter or in relation to financial arrangements following breakdown of a relationship</p> <p>Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), e.g. if you instruct us on matter related to your employment or in which your employment records are relevant</p> <p>Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs, e.g. if you instruct us on discrimination claim</p> <p>Your trade union membership, e.g. if you instruct us on discrimination claim or your matter is funded by a trade union</p> <p>Health information such as your medical records, e.g. if we are acting for you in a personal injury claim</p> <p>Genetic information and/or biometric information used to identify someone e.g. where this is relevant to the matter we are working on for you</p>

The main purpose of collecting and using this information is to provide products and services to you. However we may also collect and use the above information for the purposes set out in the table below ('How and why we use your personal data'). If you do not provide personal data when we ask for or if you stop us from using it once provided, it may delay or prevent us from providing services to you.



How your personal data is collected

We collect most of this information from you direct, through online forms (including enquiry forms on our website) or via our secure online client portal. 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.:
 - sanctions screening providers;
 - credit reference agencies;
 - client due diligence providers;
- from a third party with your consent, e.g.:
 - your bank or building society, another financial institution or advisor;
 - consultants and other professionals we may engage in relation to your matter;
 - your employer and/or trade union, professional body or pension administrators;
 - your doctors, medical and occupational health professionals;
- via our website - we use cookies on our website (for more information on cookies, please see our Cookies Policy on our website)
- via our information technology (IT) systems, e.g.:
 - case management, document management and time recording systems;
 - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV, communications systems, email and instant messaging systems

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.:

- you have given consent - where we need your consent, we will ask for it separately of this privacy policy and you can withdraw consent at any time;
- to comply with our legal and regulatory obligations;
- to fulfil our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party.

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

will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You have the right to object to processing based on legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms or the processing is required to establish, exercise or defend legal claims.

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
<p>Providing services to you - this may include (but is not necessarily limited to), where applicable, sharing your personal data with other parties, such as the other side's solicitor, Courts, barristers, experts or other parties or agents providing services to us or you as part of our handling of your matter or otherwise required to be involved in it – in some circumstances, this may include such other parties processing your personal data, and it being stored in cloud-based facilities, such as where we use cloud-based form creation services, or generative AI services (e.g. when carrying out legal research or producing legal documentation, including correspondence)</p>	<p>To fulfil our contract with you or to take steps at your request before entering into a contract</p> <p>Where necessary (such as where special category data is involved) we may rely on your consent to process the data, which consent you can withdraw at any time</p>
<p>Preventing and detecting fraud against you or us</p>	<p>For our and/or your legitimate interests, i.e. to minimise fraud that could be damaging for you and/or us</p>
<p>Conducting checks to identify our clients and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> - to comply with our legal and regulatory obligations - for our legitimate interests


What we use your personal data for	Our reasons
<p>To check whether there is any conflict of interest between us and you and/or between you and another client</p> <p>In some circumstances, this may include such other parties processing your personal data, and it being stored in cloud-based facilities, such as where we use identification and screening services where the data within those services and the results are held in cloud-based storage</p>	<p>To comply with our legal and regulatory obligations</p>
<p>To enforce legal rights or defend or take legal proceedings</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> - to comply with our legal and regulatory obligations - for our legitimate interests, i.e. to protect our business, interests and rights
<p>Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> - to comply with our legal and regulatory obligations - for our legitimate interests
<p>Ensuring internal business policies are complied with, e.g. policies covering security and internet use</p>	<p>For our legitimate interests i.e. to make sure we are following our own internal procedures so we can deliver the best service to you</p>
<p>Operational reasons, such as improving efficiency, training and quality control, compliance with our obligations to third parties, such as arrangements with referrers of work who require confirmation of our instruction on your behalf</p>	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price</p> <p>For our legitimate interests or those of a third party, in establishing, exercising or defending legal claims</p> <p>For our legitimate interests or those of a third party, in establishing their entitlement to payment in respect of referrals of work</p>
<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> - for our legitimate interests, i.e. to protect trade secrets

What we use your personal data for	Our reasons
	<p>and other commercially valuable information</p> <ul style="list-style-type: none"> - to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> - for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us - to comply with our legal and regulatory obligations To comply with our legal and regulatory obligations
Updating and enhancing client records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> - to fulfil our contract with you or to take steps at your request before entering into a contract - to comply with our legal and regulatory obligations - for our legitimate interests, e.g. making sure we can keep in touch with our clients about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> - to comply with our legal and regulatory obligations - for our legitimate interests, e.g. to make sure we are following our own internal procedures and working

What we use your personal data for	Our reasons
	efficiently so we can deliver the best service to you
Marketing our services to: <ul style="list-style-type: none"> • 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. 	Depending on the circumstances: <ul style="list-style-type: none"> - for our legitimate interests, i.e. to promote our business - consent (which you can withdraw at any time)
Credit reference checks via external credit reference agencies	For our legitimate interests, i.e. for credit control and to ensure our clients are likely to be able to pay for our services
To deal with complaints or claims	Depending on the circumstances: <ul style="list-style-type: none"> - to comply with our legal and regulatory obligations - for our or your legitimate interests, e.g. to make sure any potential claim is reported to our insurer
External audits and quality checks, e.g. for Lexcel or CQS accreditation and the audit of our accounts	Depending on the circumstances: <ul style="list-style-type: none"> - for our legitimate interests, i.e. to achieve and maintain relevant accreditations so we can demonstrate we operate at the highest standards - to comply with our legal and regulatory obligations
Obtaining online reviews via an external online review service	We may pass your contact details to an external online review service in order to gather online reviews in relation to the service we have provided to you

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;

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- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent;
 - the processing is necessary to establish, exercise or defend legal claims; or
 - the processing is necessary for reasons of substantial public interest.

Marketing

We may use your personal data to send you updates (by email, SMS message, telephone, post or social media channels) about legal developments that might be of interest to you and/or information about our services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**') and certain regulations mean that we are able to provide our existing clients and business contacts with electronic marketing communications regarding similar services. 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 Department 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.

Who we share your personal data with

We may share personal data with:

- professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors or other experts;
- other third parties where necessary to carry out your instructions, e.g. your mortgage provider or HM Land Registry in the case of a property transaction or Companies House;
- companies providing services for money laundering checks and other crime prevention purposes and companies providing similar services, including financial institutions and credit reference agencies;
- our insurers and brokers;

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- external auditors, e.g. in relation to our Lexcel or similar accreditation and the audit of our accounts;
 - our banks;
 - external service suppliers, representatives and agents that we use to make our business more efficient, e.g. typing services, marketing agencies, document collation or analysis suppliers;
 - automated marketing platforms operated by us.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. Where appropriate, we ensure all outsourcing providers operate under service agreements or terms that are consistent with our legal and professional obligations, including in relation to confidentiality.

We or the third parties mentioned above may occasionally also share personal data with:

- our and their external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised but this may not always be possible and the recipient of any of your personal data will be bound by confidentiality obligations

Where your personal data is held

Personal data 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 after we have finished advising or acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;

- to show that we treated you fairly;
- to continue to carry out conflict checks to prevent breaches of regulatory obligations or client confidentiality;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of data. Further details on this are available in our Data Retention Policy and Archiving Procedure, copies of which can be provided on request.

In general, paper files and records will be destroyed at our specific destruction date. For many routine matters, this is seven years from the point that the file is closed. However, there are some exemptions to this.

As far as electronic files are concerned, the substantive material within that file will be deleted at or around the same time that any paper file is destroyed. However, key details (such as your details and those of any associated parties) will be kept indefinitely, in order for us to protect our clients' confidentiality and to avoid breaches of disclosure obligations, and to prevent conflicts, all by carrying out conflict checks.

Electronic files also allow us to respond to claims, and to enquiries by law enforcement agencies.

Regulations relating to identifying clients for anti-money laundering purposes specify that, in the absence of consent, material obtained from clients for that specific purpose should be kept for no more than five years from the end of the transaction or business relationship. However, the additional purposes for the use of information listed above will possibly exceed five years. Consequently, we shall treat your continuing instruction of us as your consent relating solely to our retaining material provided by you for the purposes of identification for anti-money laundering purposes for more than five years. Your papers (including any information used for the purpose of identifying you) will then be destroyed in accordance with our existing file archive and destruction policy.

Your rights

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

Access	You have the right to ask us for access to your personal data. You can request other information such as where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for
Rectification	You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete
Erasure (also known as the	You have the right to ask us to delete your personal data - in certain situations


right to be forgotten)	
Restriction of processing	You have the right to ask us to limit how we use your personal data - in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	You have the right to ask that we transfer the personal data you gave to us to another organisation or to you – in certain situations
To object	You have the right to object: <ul style="list-style-type: none"> - 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 unless we demonstrate compelling legitimate grounds for the processing which override your interests or for establishing, exercising or defending legal claims
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
The right to withdraw consent	We only rely on consent in certain limited cases. When we use your consent as our lawful basis, you have the right to withdraw that consent at any time You may withdraw consents by contacting either the person dealing with your matter or Jonathan Cornes, via the contact methods set out below. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

The person at Ramsdens Solicitors LLP responsible for data protection is Jonathan Cornes.

If you make a request, we must respond to you without undue delay and in any event within one month.

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 client or matter reference number);

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- 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 implemented appropriate technical and organisational measures to keep your personal data confidential and secure from unauthorised access, use and disclosure. 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.

How to complain

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

You may also have the right to lodge a complaint with the Information Commissioner's Office (the UK data protection regulator also known as the ICO).

The contact details for the ICO are:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Please contact us if you would like further information.

Changes to this privacy notice

This privacy notice was published on 11 May 2018 and has been updated since.

We may change this privacy policy from time to time. When we do we will publish the updated version on our website and ask for your consent to the changes if legally required.



Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, e.g. your surname or address - see 'How to contact us'

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, or to exercise a right under data protection law or to make a complaint.

Our contact details for data protection purpose are shown below. For any other purposes you should use the contact details given to you by the person or people handling your matter.

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

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us - see 'How to contact us'.