

Winckworth
Sherwood

Winckworth Sherwood LLP
Privacy Notice

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1. Introduction

We, meaning Winckworth Sherwood LLP, a limited liability partnership registered in England and Wales (registered number OC334359), are committed to respecting your privacy and complying with applicable data protection and privacy laws. This notice outlines how we collect and use your information, and tells you about your privacy rights and how the law protects you. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This general privacy notice supplements other more specific privacy notices and is not intended to override them.

2. Who this notice is addressed to

Data protection law gives privacy rights to individuals. Any reference to “you” or “your” in this privacy notice refers to the individuals about whom we process personal data.

Personal data does not include information which is solely about corporate bodies or other legal entities which are not natural persons. However, this notice does explain how we may process personal data about individuals which is supplied to us.

It is therefore important that all of our clients, suppliers and other third parties with whom we do business read and understand this privacy notice. Persons providing us with personal data about individuals (such as directors, shareholders, beneficial owners, employees, counterparties, family members and customers) must ensure that they have a

legal right to pass that personal data to us and that, where this is required, those individuals are made aware of this privacy notice so that they can understand how their personal data may be used by us.

3. Data Controller

Winckworth Sherwood LLP is the data controller and we are responsible for your personal data. Please note that any personal data collected or processed by any of our partners, employees or consultants is controlled by Winckworth Sherwood LLP and not by those individuals.

We have appointed a Data Protection Officer (DPO) to be responsible for responding to questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out in section 12 below.

4. The data we process

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). Please see the table in paragraph 5 which describes the types and categories of data we collect.

5. How and why we process your data

Subscribers to our newsletter or other promotional material, attendees of seminars or events, visitors to our website and other informal contacts

The types of data we process	How we collect your data	How we use your data	Who we share your data with	The lawful basis for processing data
<p>Your personal details including name, date of birth, title, address, telephone numbers and email addresses, marital status.</p> <p>Business information such as job title, name of employer, details of business.</p> <p>Any other personal information you choose to give us, including dietary or access requirements – this may involve sensitive personal data relating to health or religious beliefs.</p> <p>Operational personal data such as CCTV footage, recordings of telephone conversations or logs of visitors.</p> <p>Information from cookies on our website, including Internet Protocol (IP) address, browser type and version, approximate location, device type, time zone setting, operating system and platform.</p>	<p>From you directly.</p> <p>From publicly available sources such as employer website, LinkedIn etc.</p> <p>When you attend our offices for a seminar or other event, or call or contact us, this information is retained.</p> <p>From cookies and web forms when you visit our website.</p>	<p>To send you business or marketing communications (such as legal updates or information about events).</p> <p>To effectively respond to and deal with your query in the event that you contact us.</p> <p>To facilitate your access to any of our onsite facilities.</p> <p>To understand how individuals use the website and to give you a good user experience on our website.</p> <p>To operate our Customer Relationship Management (CRM) system.</p>	<p>Personal data may be made available to our partners, employees and consultants.</p> <p>If we share it with service providers it will be limited to that which is required for providing the service and will be adequately protected.</p> <p>It will not be shared with other third parties, apart from in limited circumstances, such as if we run a joint seminar which you attend.</p>	<p>Because we do not have a contract with you, in general we rely on our legitimate interests, which means that we process data to the extent that we believe our right to contact you or otherwise process your data does not override your right to privacy. It is a legitimate business interest for us to send information about the services we provide as a law firm.</p> <p>We will always have regard to your fundamental rights and freedoms when processing your personal data.</p> <p>In some circumstances we may ask for your consent for some of our processing activities. Where we do so we will ensure consent is obtained in a freely given and unambiguous manner.</p> <p>Where we are processing data based on your consent, you have the right to change your mind and withdraw consent at any time by contacting us. In any event, you have the right to object to our use of your personal data for marketing purposes.</p> <p>If you wish to block cookies on your computer, you can do so in your browser settings.</p>

Providing legal services

The types of data we process	How we collect your data	How we use your data	Who we share your data with	The lawful basis for processing data
<p>Your personal details including name, date of birth, title, address, telephone numbers and email addresses, marital status.</p> <p>Business information such as job title, name of employer, details of business, and other information provided in the course of the contractual or client relationship between you or your organisation and Winckworth Sherwood LLP, or otherwise voluntarily provided by you or your organisation.</p> <p>Passport details or immigration status.</p> <p>Anti-money laundering information which the law requires us to collect in relation to clients such as national identity card, utility bills, bank statements and similar documents.</p> <p>Financial information including payment details, bank account details, source of funds, credit information, credit/debit card numbers, security codes and other related billing information.</p> <p>Sensitive personal data relating to health, political opinions, race or ethnicity, religious beliefs, trade union membership, genetic or biometric information, sex life or sexual orientation, or criminal convictions or offences. For example, when you give us dietary requirements these may reveal health or religious belief data.</p> <p>Any other personal information you choose to give us when contacting us or instructing us or which is provided to us by a client in the course of obtaining legal services.</p> <p>Operational personal data such as CCTV footage, recordings of telephone conversations or logs of visitors and notes of meetings.</p> <p>Information from cookies on our website, including Internet Protocol (IP) address, approximate location, browser type and version, device type, time zone setting, operating system and platform.</p>	<p>Direct interactions:</p> <p>When you seek legal advice or formally instruct us.</p> <p>When we carry out due diligence on you or your organisation.</p> <p>When corresponding with us by post, phone, email or otherwise.</p> <p>Automated technologies:</p> <p>As you interact with our website it may automatically collect technical data using cookies.</p> <p>Contact details from email signatures are automatically imported into our Customer Relationship Management (CRM) software so that it is easier for us to find your contact details in the future.</p> <p>Third parties or publicly available sources:</p> <p>When a client gives us personal data about third party individuals which is relevant to the legal advice they seek.</p> <p>Publicly accessible resources such as Companies House or the Land Registry.</p> <p>Financial and transaction data from providers of technical, payment and delivery services.</p> <p>From a third party with your consent such as your bank, any consultants or professionals you may engage, or your employer.</p> <p>If we need your personal data for a statutory requirement (such as for anti-money laundering compliance) or to fulfil a contract with you, and you fail to give us that personal data, we may not be able to carry out your instructions or fulfil that contract. If this is the case, we will notify you of this.</p>	<p>To register you as a client, if applicable.</p> <p>To provide and administer legal advice and services to our clients.</p> <p>To run our business affairs, including internal record keeping, conflict checking, training, supervision and auditing.</p> <p>To carry out verification checks in relation to anti-money laundering procedures.</p> <p>To administer and manage our relationship with our clients, including processing payments, accounting, auditing, billing and collection and taking other steps linked to the performance of our business relationship such as identifying persons authorised to represent our clients, suppliers or service providers.</p> <p>To deal with your query in the event that you contact us.</p> <p>To comply with our legal and regulatory obligations.</p> <p>To send business or marketing communications (such as legal updates or information about events) which we think may be of interest.</p> <p>To understand how individuals use our website and to give you a good user experience on our website.</p> <p>For insurance purposes and to manage our own liability.</p> <p>To facilitate your access to any of our on-site facilities.</p> <p>Any other processing for which you have given your consent, for example receiving marketing information or legal updates.</p>	<p>Your information will be processed by our partners, employees and consultants in order for us to carry out and manage our business activities.</p> <p>We may also share your information with third parties, including:</p> <p>Contractors or agents working on our behalf, such as our professional advisers or auditors.</p> <p>Credit reference or fraud and crime prevention agencies.</p> <p>Regulatory bodies as required by the law.</p> <p>Registrars such as Companies House and HM Land Registry.</p> <p>Third party service providers who perform functions on our behalf under contract, and who support us in connection with the legal services we provide, such as barristers, consultants, mediators, experts, other law firms for obtaining specialist or foreign legal advice, translators, education evaluation services, couriers, or other necessary entities.</p> <p>Courts, law enforcement authorities, regulators, government officials or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal claim, or for an alternative dispute resolution process.</p> <p>Third parties to whom we may choose to sell, transfer, or merge parts of our firm or our assets. Alternatively, we may seek to acquire other firms or merge with them. If a change happens to our business, then the newly constituted firm may use your personal data in the same way as set out in this privacy notice.</p>	<p>Your relationship with us will determine why we collect particular information about you. When we process data about our own individual clients, the principal basis is that it is necessary for us to perform a contract with you.</p> <p>We are required by law to collect certain information, such as that required for anti-money laundering compliance.</p> <p>In some circumstances, we may process your personal data for our legitimate business interests.</p> <p>If your data has been provided to us by a third party (such as one of our clients), we will process your data based on the legitimate interest of our client in receiving legal advice.</p> <p>There may be particular instances where we require your consent for processing your data. We will ensure consent is obtained in a freely given and unambiguous manner.</p> <p>We will always have regard to your fundamental rights and freedoms when processing your personal data.</p> <p>We will only use your personal data for the purposes for which we collected or obtained it, unless we reasonably consider that we need to use it for another reason and that reason has a lawful basis.</p> <p>If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.</p> <p>Where we process sensitive personal information in the course of client services, we may do so to assist our client to establish, exercise or defend legal claims or to assist our client in fulfilling the rights and obligations of applicable employment or social security laws. For example, in some employment representations, such as disputes involving alleged discrimination, information about medical conditions, race, religion and/or sexual orientation may be relevant to the representation. Similarly, representations in tax or social security matters may also require us to collect sensitive personal information, such as if we are advising on whether certain disabilities qualify for social security or tax benefits.</p>

6. Consent

Where we decide to obtain your consent to hold your information we will collect your consent in plain and clear language and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject.

Where we do rely on consent you have the right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent we will immediately cease using any personal information obtained and processed under that consent unless we have some other legal obligation to continue to use it.

7. How long will we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it.

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 unauthorised use or disclosure of your personal data, the potential risk of harm from the deletion of that 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. For example, financial and statutory reporting requirements mean we must keep certain records for a period of 8 years.

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.

8. Your rights

To exercise any of your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to be informed about the processing and to the specific information in this privacy notice (such right cannot be exercised where legal professional privilege or legal confidentiality requirements apply)
- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from, subject to legal professional privilege and legal confidentiality. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of £25 per request. We may also charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated once we have verified that it was incorrect.
- The right to request that your information be erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a

request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest).

- The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.
- The right to data portability. You have the right in some circumstances to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data.
- The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within 30 days of receiving your request.

We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of your rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

To exercise your rights please do so by writing

to our Data Protection Officer at the address listed in section 12.

9. International transfers

We do not transfer your personal data outside the European Economic Area (EEA) but our website and online resources are accessible from outside of the UK / European Economic Area.

10. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those partners, 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.

11. Changes to the privacy notice

We may update this privacy notice from time to time. The latest privacy notice will always be available at our website, www.wslaw.co.uk.

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.

12. Contact details and complaints procedure

Name of DPO: Toni Vitale
Email address: dpofficer@wslaw.co.uk
Postal address: The Data Protection Officer,
Winckworth Sherwood LLP, Minerva House, 5
Montague Close, London SE1 9BB.

We always aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing appropriate measures to keep your information secure.

If you are not satisfied with the information provided in this notice or our processing of your personal data, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

The Information Commissioner can be contacted at:
The Information Commissioner, Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF
Tel: 0303 123 1113 or +44 1625 545745

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance so we can resolve your queries or provide you with any additional information required.