

Privacy Policy

1. Introduction

- 1.1. We take your privacy very seriously. Please read this Privacy Policy 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.
- 1.2. 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 your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

2. Key terms

- 2.1. It would be helpful to start by explaining some key terms used in this policy.

We, us, our	Wayne Leighton LLP
Our data protection officer	Rahul Shah Tel: 0208 951 2988 Email: rahul@wayneleighton.com
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

3. Personal data we collect about you

- 3.1. 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 <u>will</u> collect	Personal data we <u>may</u> collect depending on why you have instructed us
Your name, address and telephone number	Your National Insurance and tax details
Information to enable us to check and verify your	Your bank and/or building society details

Personal data we <u>will</u> collect	Personal data we <u>may</u> collect depending on why you have instructed us
<p>identity, e.g. your date of birth or passport details</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>Details of your professional online presence, e.g. LinkedIn profile</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>Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information</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>Personal identifying information, such as your eye colour or your parents' names, e.g. if you instruct us to incorporate a company for you</p>

Personal data we <u>will</u> collect	Personal data we <u>may</u> collect depending on why you have instructed us
	Your medical records, e.g. if we are acting for you in a personal injury claim

3.2. This personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

4. How your personal data is collected

4.1. We collect most of this information from you direct. However, we may also collect information

4.1.1. from publicly accessible sources, e.g. Companies House or HM Land Registry;

4.1.2. directly from a third party, e.g.

- (a) sanctions screening providers
- (b) credit reference agencies
- (c) client due diligence providers;

4.1.3. from a third party with your consent, e.g.,

- (a) your bank or building society, another financial institution or advisor
- (b) consultants and other professionals we may engage in relation to your matter
- (c) your employer and/or trade union, professional body or pension administrators
- (d) your doctors, medical and occupational health professionals;

4.1.4. via our website. We may collate and use information about visitors to our website. Some of this information will include the use of cookies. Cookies also known as browser cookies or tracking cookies, are small often encrypted text files located in browser directories. They are used by web developers to help users navigate their websites efficiently and perform certain functions. The cookies in use on our website owned and managed by the firm gather information and statistics about visitors. Cookies make it easier for you to access our content pages and to log on to any user accounts which we create for you. We do not use or store personal data without express permission and use cookie related data on a collective basis to analyse traffic and website performance. We use this information to help us improve our website.

5. How and why we use your personal data

5.1. We take your privacy and personal data very seriously. We will not disclose or share any of your personal data without your consent.

5.2. Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.,

- 5.2.1. to comply with our legal and regulatory obligations,
 - 5.2.2. for the performance of our contract with you or to take steps at your request before entering into a contract,
 - 5.2.3. to verify your identity and to update and enhance our client records,
 - 5.2.4. for our legitimate interests or those of a third party, or
 - 5.2.5. where you have given consent.
- 5.3. 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.
- 5.4. 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	For the performance of our contract with you or to take steps at your request before entering into a contract
<p>Conducting checks to identify our clients and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing 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>	To comply with our legal and regulatory obligations
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 so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	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
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect our intellectual

What we use your personal data for	Our reasons
	<p>property and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
<p>Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, work type or other efficiency measures</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>Preventing unauthorised access and modifications to systems</p>	<p>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</p> <p>To comply with our legal and regulatory obligations</p>
<p>Updating and enhancing client records</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services</p>
<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>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 you</p>
<p>Marketing details</p>	<p>To provide you with information in respect of marketing our services</p>

What we use your personal data for	Our reasons
External audits and quality checks, e.g. for CQS accreditation and the audit of our accounts	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

- 5.5. The above table does not apply to special category personal data, which we will only process with your explicit consent.
- 5.6. Should we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which permits the use of your personal data. When sensitive personal data is collected, we only request information required for a specified purpose. You may modify or remove your consent at any time unless there is a legitimate interest or reason for not doing so.
- 5.7. We may process your personal data without your knowledge or consent where this is permitted by law.

6. Who we share your personal data with

- 6.1. We routinely share personal data with:
 - 6.1.1. professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors or other experts,
 - 6.1.2. 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,
 - 6.1.3. credit reference agencies,
 - 6.1.4. our insurers and brokers,
 - 6.1.5. external auditors, e.g. in relation to CQS accreditation and the audit of our accounts,
 - 6.1.6. financial organisations,
 - 6.1.7. 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,
 - 6.1.8. other law firms to whom we refer business.
- 6.2. 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 relating to ensure they can only use your personal data to provide services to us and to you.
- 6.3. We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

6.4. 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.

7. Where your personal data is held

7.1. Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above.

8. How long your personal data will be kept

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

8.1.1. To respond to any questions, complaints or claims made by you or on your behalf.

8.1.2. To show that we treated you fairly.

8.1.3. To keep records required by law.

8.2. We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.

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

9. Your rights

9.1. You have the right to:

9.1.1. be informed of the data we hold about you, the purpose of the data, how this data has been obtained and how long this data will be stored,

9.1.2. request access to your personal data allowing you to receive a copy of what information we hold about you and to check that this information is lawfully being processed by us,

9.1.3. “be forgotten” and have your data deleted so long as there is no reason for us to continue processing,

9.1.4. require us to correct any personal data that we hold,

9.1.5. object at any time to your personal data being processed for direct marketing or in certain other situations to our continued processing of your personal data,

9.1.6. require us to restrict the processing of your data in certain circumstances, e.g. if you contest the accuracy of the data,

9.1.7. complain to a supervisory authority.

9.2. For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the GDPR.

9.3. If you would like to exercise any of those rights, please:

- 9.3.1. email, call or write to us, see below 'How to contact us', let us have enough information to identify you, e.g. your full name, address and client or matter reference number;
 - 9.3.2. 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
 - 9.3.3. let us know what right you want to exercise and the information to which your request relates.
- 9.4. You do not have to pay to access your personal data or to exercise any of your rights. However if the request for access is unfounded or excessive we may charge a reasonable fee or refuse to comply with the request.

10. Keeping your personal data secure

- 10.1. 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.
- 10.2. 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.
- 10.3. 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 www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

11. How to complain

- 11.1. We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your information.
- 11.2. The GDPR 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 <https://ico.org.uk/concerns> or telephone 0303 123 1113.

12. Changes to this policy

- 12.1. We reserve the right to change this Privacy Policy from time to time and may notify you from time to time in other ways regarding the processing of your personal data. Should we change our Privacy Policy, we will publish the updated policy on our website. Please check this Privacy Policy regularly.

13. How to contact us

- 13.1. Please contact our Data Protection Officer by post, email or telephone if you have any questions about this Privacy Policy or the information we hold about you.
- 13.2. Our contact details are shown below:

Rahul Shah, Senior Partner

Wayne Leighton LLP
Catalyst House
720 Centennial Court
Centennial Park
Elstree
Herts
WD6 3SY

Tel: 020 8951 2988

Email: rahul@wayneleighton.com