

## Privacy Policy

In this Privacy Policy the terms, 'we' or 'us' is Carter Bond Solicitors part of BBS Law Ltd, a legal practice, regulated by the Solicitors Regulation Authority (SRA) number SRA ID: 556112 in England and Wales.

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number ZA211153.

Please read this policy carefully as it contains important information to help you understand how and why we process any personal information that you give to us. This together with our website terms of use explains how we use and process personal information collected. It addresses information provided to us when visiting our site, when consulting in connection with provision of legal services, otherwise as a result of our communications with you or one of our clients, when subscribing to our email updates or other marketing activities. It sets out how we process it, with who we may share it and choices you can make regarding use of information collected. It does not apply to personal information of staff in connection with employment.

### Changes/updates

Technology and data privacy best practice are continually evolving areas. We reserve the right to revise this notice from time to time in consequence. Changes will be incorporated on this page. Please review it periodically. Further information about data privacy may be found in our client engagement letter sent to you along with our terms and conditions.

### **We may collect personal information in a number of ways, including:**

- Online via our site or any of our social media accounts such as Instagram, LinkedIn and Facebook
- In hard copy by fax or post, in person, or over the telephone
- Via phone recording in connection with our debt recovery services
- Through provision of legal or training services to you in person or electronically
- During the course of our dealings with you for or on behalf of a client
- When you provide us with information relating to attendance on seminars or other promotional events
- When you contact us via this site by filling in a form to register for newsletters, email updates, competitions, seminars, events sponsored by us, or other services
- When you contact us with queries, we may keep a record of that correspondence
- When you complete surveys for research or quality purposes, although you do not have

to respond to them

- When you attend in person at one of our offices, including location data
- When we collect your personal data from other third parties, for example from our insurer clients, other clients or their representatives, including but not limited to loss adjusters or claims investigators or other individuals connected to a claim or matter where we are instructed to act as well as other law firms
- When we collect publicly available information about you or your business, including, directly or indirectly, through electronic data sources, for example (but without limitation) for the preparation or filing of legal documents and forms, and in connection with anti money laundering, counter terrorist financing and credit risk reduction
- For placement, recruitment and selection purposes.

### **What information we collect**

We process personal information which you give us:

- As a client to provide you with legal services.
- Whilst servicing your account through our through our electronic systems, website, in writing or over the phone.
- If you request information or assistance from us.

### **What personal information we collect**

The type of information collected depends upon our relationship with you and the context in which we obtain and process your personal data. Information collected and processed may include details of the following types of information:

- Contact information (name, address, (including postal and email addresses), telephone and fax numbers and gender)
- Occupational information, (job title, former job titles, organisational associations, professional experience and qualifications, interests and preferences where you advise us of these details in order to provide you with relevant tailored information about our services)
- Identification documents, including date of birth and photographic identification
- Online services in respect of which you have expressed an interest
- Other information collected and used in the course of our business, including (but without limitation) information provided by our clients concerning employees of our clients or those providing services to our clients and information about you which is publicly available and collected, directly or indirectly, from electronic data sources

- Details of your visits to our site, the resources accessed, including traffic data, location data and other communication data
- Images captured by CCTV cameras at our offices
- Where necessary and legally permitted, we may also collect sensitive data, such as diversity and health data and details of offences and related proceedings.
- Credit history and records relating to you, your partner or anyone else you are financially linked with (we obtain this information from credit reference and fraud prevent agencies).
- Family, lifestyle, financial and social circumstances.
- Financial details such as your income and information about your bank accounts.
- Employment/self-employment details.

### **Special Categories of Personal Data**

Special categories of personal data include information about an individual's health and other categories of personal information which are closely protected.

We do not generally process such information unless you have voluntarily provided this to us, or it is relevant to the legal service you have asked us to provide you with. For example, in Family & Matrimonial matters, or where you have advised us of an issue, such as your health, which could mean that you may be classed as a “vulnerable client” i.e. due to your personal circumstances or personal characteristics you are particularly vulnerable to financial detriment. We will process sensitive information where you have provided this information to us and have agreed that we can use this information to deliver products and services to you. Where possible we shall seek to minimise the collection and use of such special categories of personal data.

### **How we use your Information**

We use your information to:

- Provide legal services to you.
- Provide and service your relationship with us.
- Comply with legal obligations for the prevention of financial crime and money laundering.
- Ensure content from our site is presented in the most effective manner
- Contact you by email, fax, post or phone where you have provided contact details. We may also keep a record of that correspondence
- Notify you about changes to our service
- Improve our products and services, including dealing with claims, legal proceedings and non contentious matters under a retainer
- Conduct our legitimate business interests and those of our clients in connection

with the provision of our legal services

- Maintain internal records, including about cancelled accounts
- Ensure good governance, accounting, management and auditing
- Carry out our obligations arising from any contracts entered into between us
- Refer you to another team within our team about other legal services which may be of benefit to your interests
- Provide you with information, products or services which you request from us
- Facilitate the provision to you of online or other training services
- Send you information, or newsletters and legal updates which you may find of interest where you have indicated your wish to be contacted for such purposes
- Pass your details to experts, including counsel and other professionals for the purposes of obtaining professional advice and complying with our contractual obligations
- Pass your details to secure third party service providers, who are under contract to assist us in our provision of legal services
- To contact you in the course of providing services to our clients
- Assist with recruitment and selection process
- Convert into anonymised, statistical or aggregated data which can't be used to identify you but may be used for the purposes of statistics, research reporting and future planning for our business and strategic objectives
- Where we have other legitimate reasons, such as to enforce our terms of use, or take other action required or permitted by law or for other safety and security reasons
- To respond to complaints against us
- We also process personal data in anonymised form for statistical and/or insurance and/or legal advice purposes.

### **Who do we share your information with**

In providing our services, we may provide your personal information to staff in our offices or other third parties, such as:

- Any successors in title to our business, or as part of mergers
- To other suppliers, such as expert witnesses, counsel, counsel's administrative support or other external agencies such as translations services, IT support service providers (including training providers) that we engage on our/your behalf. When we do so, they are required to act in accordance with our instructions and keep your personal information secure with an adequate level of protection
- To courts, tribunals and other government bodies and relevant regulators (SRA, Law

Society and the ICO) in connection with matters relating to provision of our services

- To fraud prevention agencies
- To professional indemnity insurers, brokers, auditors and other professional advisers
- To our clients in connection with the provision of our services
- To auditors in connection with maintenance of our quality certifications
- To other third parties when required by law or other regulatory authority, where we are under a duty to do so to comply with legal or professional obligations (for example to comply with anti-money laundering obligations and counter terrorism measures)
- To enforce or protect our rights, property or the safety of our partners, staff and clients. (This includes exchanging information with other companies and organisations for the purposes of fraud prevention and detection and credit risk reduction)
- To other parties in legal proceedings, including solicitors acting on the other side of a case or transaction
- To costs draftsmen
- To financial institutions providing finance for transactions.

### **On what basis do we process your information**

The legal grounds for processing your personal data depend upon the nature of our relationship with you and the context of processing and are as follows:

- Processing is necessary for the performance of a contract with you, or to take steps prior to entering into a contract with you. Our retainer is comprised of our engagement letter and our terms and conditions of business which sets out the terms of the contract and the services to be provided to you. If you ask us to provide online training, we will invite you to sign our terms and conditions for the supply of online training services
- Processing is necessary for the purposes of our legitimate interests or those of our clients in the provision of legal services and use in legal proceedings, except where those interests are overridden by the interests, rights or freedoms of affected individuals. In order to determine this we shall weigh up a number of factors, including what you were told at the time you provided your data, what your reasonable expectations are, and the nature of the data as well as its impact upon you
- Processing is necessary for compliance with mandatory legal obligations to which we are subject.

We will process your information in order to meet our contractual obligations to you, where we have a legitimate interest to do so, where we are permitted by law or to comply with applicable laws and regulation.

How long do we keep your personal information

We only retain your information for as long as is necessary for the purpose for which it was obtained. This could include compliance with legal obligations (by way of example, in relation to anti money laundering regulations and counter terrorist financing where we are required to keep information for minimum periods). It could also include conducting legal work as instructed, or establishing or defending claims which could be made against us, for example for negligence in the performance of our obligations.

Information collected from you concerning other people

Where you provide personal information to us about other people, we accept it on the understanding that you have made the other person aware about how we will use and disclose their information.

PURPOSE	LEGAL BASIS
<b>Providing a service and internal processing</b>	
To assess your needs and provide you with suitable products and services	<ul style="list-style-type: none"> <li>• <b>Contractual obligation</b> to provide you with, or a proposal including a costs estimate</li> <li>• Where special categories of personal data are processed, these are necessary to assess your needs</li> </ul>
To service and administer your matter including billing	<ul style="list-style-type: none"> <li>• <b>Legitimate interests</b> to provide and manage the service</li> </ul>
To verify the identity of our clients	<ul style="list-style-type: none"> <li>• To comply with <b>legal obligations</b> to prevent money laundering</li> </ul>
To confirm, update and improve our client records	<ul style="list-style-type: none"> <li>• To comply with <b>legal obligations</b> in the Data Protection legislation</li> </ul>
To provide you with any information on the services that you have requested	<ul style="list-style-type: none"> <li>• To meet our <b>contractual obligation</b> to provide information on the services you have requested</li> </ul>

<b>Relationship Management</b>	
To manage and develop our relationship with you	<ul style="list-style-type: none"> <li>• <b>Legitimate interest</b> to service your matter and improve our service to you</li> </ul>
To inform you of products and services that may be of interest to you, where you have chosen to be made aware of this	<ul style="list-style-type: none"> <li>• <b>With your consent</b></li> </ul>
<b>Training and development</b>	
For training purposes and to improve our service to you	<ul style="list-style-type: none"> <li>• <b>Legitimate interests</b> to improve our services and develop our employees</li> </ul>
<b>Complying with Legal Obligations</b>	
To prevent, investigate and prosecute crime, fraud and money laundering	<ul style="list-style-type: none"> <li>• To comply with <b>legal obligations</b> for prevention of financial crime and money laundering</li> </ul>
For auditing purpose	<ul style="list-style-type: none"> <li>• To comply with our <b>legitimate interest</b> to conduct audits</li> </ul>
If we are obliged to disclose information by reason of any law, regulation or court order	<ul style="list-style-type: none"> <li>• To comply with legal obligations</li> </ul>
<b>Other</b>	
To transfer information to any entity which may acquire rights in us	<ul style="list-style-type: none"> <li>• Legitimate interests for commercial interests</li> </ul>
For any other purpose to which you agree.	<ul style="list-style-type: none"> <li>• With your consent</li> </ul>

## How we retain your personal information

We will retain your personal information in accordance with applicable laws. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set out above.

Our retention periods are:

Type of personal Information	Retention Period
General personal data which includes your normal personal data, personal identity and personal financial data	<ul style="list-style-type: none"><li>• 6 years after the end of our business relationship with you, or the end of your matter which ever comes later</li></ul>
Client Due Diligence Material which includes copies of your Passport, Drivers Licence, Bank Statements and any associated documents and explanations you have given to us to prevent fraud, financial crime and money laundering	<ul style="list-style-type: none"><li>• 5 years after the end of our business relationship with you, or the end of your matter which ever comes later</li></ul>
Special categories of personal data	<ul style="list-style-type: none"><li>• 6 years after the end of our relationship with you</li></ul>
CCTV – digital images if you visit our offices	<ul style="list-style-type: none"><li>• 60 days</li></ul>

## How we share your information

Where necessary or required we share information with:

- Regulatory authorities to comply with our legal obligations.
- Credit reference agencies to check your identity in accordance with our legal obligations.
- Property Search Companies to identify any issues that might influence your decision to buy or sell a property.
- Insurers for the purpose of providing you with appropriate financial cover for an identified insurable risk, or in connection with any claim made by you against us.
- Property Agents, Brokers, Lenders, other Solicitors involved in your transaction representing other party(ies) in your matter to enable them and us to fulfil our obligations to you.
- Other Government Departments such as HMRC, Companies House, Probate Registry, Court of Protection or HM Land Registry to fulfil your and our legal obligations.
- Experts and Barristers required to work on your matter.

- Our Auditors and external assessment bodies to achieve and maintain any Regulatory or Quality Assurance Standards and accreditations which meet our legal obligations and enable us to provide quality legal services to you.

### **Information Security**

We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

### **Marketing**

We may provide you with information which we think you may find interesting via our newsletters, updates, competitions, seminars and other events. You can choose to restrict the collection or use of your personal information for this purpose. You can ask us to change your preference for receiving such communications, including legal updates and newsletters at any time.

Whenever you receive marketing communications from us, you will be able to indicate whether you wish to update your details or preferences.

If you would prefer not to receive this information please let us know via the contact form provided, or, alternatively you can unsubscribe.

You have the right to ask us not to process your personal information for marketing purposes. When we collect contact information (for example when you pass us your business card at one of our events or meetings) we may add your details to our marketing database and mailing list. In all other cases if we intend to process your information for marketing we will inform you before collecting your information.

### **Cookies**

Our website uses cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our Website). You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

### **Your Rights**

You have the right to request copies of your personal information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased. You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop processing your personal information and/or to withdraw your agreement to processing based on 'consent', but this does not apply where we have other legal justifications to continue processing your data or an overriding legitimate interest.

In relation to all of these rights, please write to us at the address below.

### **Complaints Process**

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint. You also have the right to complain to the Information Commissioner's Office - ([www.ico.org.uk](http://www.ico.org.uk)).

### **Links to other websites**

We may include links on our site to enable you to access third party sites directly. If you follow any links, this privacy notice will not apply. Third party sites operate their own privacy policies regarding processing of personal information and the use of cookies. Please check these policies before you submit any personal data to these external sites. We do not accept any responsibility for a third party site or use of your information or their use of cookies.

### **Additional information**

The internet is a global environment. It can involve transmission of data on an international basis. Transmission of information via the internet or any social media is not completely secure. By using our site and communicating with us electronically, you acknowledge and accept our processing of your personal information in this way.

Although we adopt appropriate technical and organisational measures to protect your personal information, we can not guarantee its security when sent to this site. Transmission is at your own risk.

### **Contact Us**

You can contact us by writing to us at:

2nd Floor, Dollis Park, London, N3 1HF

Our Data Controller is Reena Popat.

Telephone queries can be made to 020 3475 6751