

General Data Protection Regulations (“GDPR”) Privacy Notice and Information for Clients

1. What are the GDPR?

The GDPR are important European regulations which introduce amendments to data protection law including introducing additional rights for individuals in relation to their personal and sensitive personal data.

The GDPR applies to all EU Member States from 25 May 2018. Bulfin & Co is committed to protecting and keeping confidential all the information you provide to us, subject to certain legal duties by which we are bound.

We ask that you read this privacy notice carefully as it contains important information about who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.

2. Identity

We are Bulfin & Co Solicitors whose main office is Town Hall Penn Road Beaconsfield HP9 2PP. Bulfin & Co is a niche law practice that exists to provide employment law advice and related services to our clients. We are authorised and regulated by the Solicitors Regulation Authority under number 130786.

3. Our use of Personal Information

In common with most law practices, we collect, use and share information, including personal information (**‘personal data’**), in connection with providing our services and running our business.

4. This Privacy Notice

This Privacy notice applies specifically to clients and prospective clients of our practice. We have other privacy statements which apply to our employees, suppliers and other third parties.

5. Updating this privacy notice

This notice may be updated from time to time. This version is dated 25 May 2018.

6. Our responsibility to you

We process your personal data in our capacity as a controller. This means that we are responsible for ensuring that we comply with relevant data protection laws when processing your personal information.

7. What is personal data?

- 7.1 **'Personal data'** means information which relates to a living person who can be **identified** from that data (a **'data subject'**) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.
- 7.2 This policy applies to all personal data whether it is stored electronically, on paper or on other materials.
- 7.3 This personal data might be provided to us by you, or someone else (such as an employer, your doctor, or another agency), or it could be created by us. It could be provided or created during the course of conduct of your matter or before or after its conclusion. It could be created by us or by a third party directly or indirectly involved in your matter.

8. How we define special categories of personal data

'Special categories of personal data' are types of personal data consisting of information as to:

- your racial or ethnic origin;
- your political opinions;
- your religious or philosophical beliefs;
- your trade union membership;
- your genetic or biometric data;
- your health;
- your sex life and sexual orientation; and
- any criminal convictions and offences.

We may hold and use any of these special categories of your personal data in accordance with the law.

9. The personal information we collect, use and share In the course of providing services to you

We collect the following personal information when you provide it to us:

- Name, address, date of birth, contact information (telephone and email where appropriate)

- National Insurance number (where appropriate)
- Identity information and documentation
- Employer or former employer identity
- Salary information
- Additional information in relation to your employment to enable us to advise you and progress your case. This may include special categories of personal information.
- Banking information

We use your personal information primarily to enable us to provide you with a legal service in accordance with your instructions. We also use your personal information for related purposes including identity verification, administration of files, updating existing records if you have instructed the firm previously, analysis to help improve the management of the firm, for statutory returns and legal and regulatory compliance.

The information will be held in hard copy and/or electronic format. You are responsible for ensuring the accuracy of all the personal data you supply to us, and we will not be held liable for any errors unless you have advised us previously of any changes in your personal data.

We will only take instructions from you or someone you authorise in writing. Where you are acting as an agent or trustee, you agree to advise your principal or the beneficiary of the trust that their personal information will be dealt with on these terms.

If we are working on your matter in conjunction with other professionals who are assisting you including experts, trade unions, medical practitioners etc., we will assume, unless you notify us otherwise, that we may share and disclose relevant personal data and information about your matter to them, if we feel it is appropriate and necessary.

On occasions we ask other trusted companies to provide typing, costing, photocopying or other support work on our files to ensure that this work can be done promptly. We will always obtain a confidentiality agreement with these outsourced providers to ensure that they keep the information sent to them securely and confidentially. All routine typing, costing and photocopying is undertaken in-house. We use a private, secure, cloud computing service to assist us in processing and protecting your information and keeping it secure from the risks of cybercrime and fraud. All IT providers we use are subject to strict confidentiality agreements with this firm and we will ensure that they meet GDPR obligations in relation to the service they provide to us.

We use a third party service provider to manage the firm's contact database via our website and deliver emails to inform you about our services, legal developments and updates. You can control the information you receive through our direct marketing function by using the "Managing your preferences" option at the bottom of the emails. If you no longer wish to receive marketing emails relating to our services by email or post, you can unsubscribe at any time by using the "Unsubscribe" option on the email footer. Your data will be deleted after 30 days of you unsubscribing.

All of the personal information you provide to us is kept in the UK; we will not transfer any of your personal data to another country outside the UK unless you specifically instruct us to do so.

There may be occasions when we are under a legal duty to share personal information with law enforcement or other authorities, including the Solicitors Regulation Authority or the Information Commissioner. Occasionally some of our client files may be audited strictly confidentially by external auditors or examiners to ensure we meet our legal, quality and financial management standards. Some information may be disclosed to our professional indemnity insurers and to our financial auditors if required. Unless you tell us otherwise we will assume you have no objection.

You may object at any time and refusing your consent will not affect our work for you. We will not submit files for external audit or disclose personal information to directories where there is particularly sensitive material.

We will not share your personal information with any other third party and will not issue any publicity material or information to the media about our relationship and the work we are doing for you without your explicit consent.

10. How long your personal data will be kept

We will hold your personal data including your name, address and contact details plus your file of papers for a period of six years from the completion of your matter. After this period of time, your file of papers including the electronic file, will be destroyed confidentially without further reference to you, unless we contact you to confirm other arrangements or you contact us to request your file of papers at an earlier date.

In order to meet our regulatory requirements, we may be required to retain basic information about you to include your name, address and date of birth on our electronic database for a longer period of time.

11. Reasons we can collect and use your personal information

Depending on the nature of the personal data, we rely on the following lawful bases to collect and use your personal data:

- (a) Your consent
- (b) Contractual obligations
- (c) Legal Obligations
- (d) Legitimate interests

12. Your rights Under GDPR

Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal information
- provide you with a copy of the personal information we hold about you

- update any inaccuracies in the personal information we hold about you
- delete any of your personal information that we no longer have a lawful ground to use
- where processing is based on consent, stop that particular processing by withdrawing your consent
- object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights
- restrict how we use your personal information whilst a complaint is being investigated
- transfer your personal information to a third party in a standardised machine-readable format
- In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

We are obliged to keep your personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information.

Any query regarding the Firm's handling of your personal information should be addressed to Karen Bulfin: karen@bulfin.co.uk

13. Your right to complain

If you are not satisfied with our use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the Information Commissioner's Office (ICO). Details of the ICO can be found at <https://ico.org.uk>.