

## **Client Privacy Notice**

### **Introduction**

This privacy policy (sometimes called a processing notice or privacy notice) aims to inform our clients, and individuals associated with our clients, how we will process their personal information.

We have a separate privacy policy for third parties (that is, individuals who have no contract with us but whose data we are handling) and, where different, visitors to our website and for our staff since the basis on which we process that personal data differs.

This policy should be read together with our terms of business and, where appropriate, our engagement letter.

Please note that this policy can only be a general summary. You may at any time request to see and, if appropriate, amend the personal data we hold about you. Details are given below under 'Your data privacy rights'.

### **The reason for this policy**

EU General Data Protection Regulation, the Data Protection Act 2018 and other applicable laws provide, or enhance, rights belonging to individuals. For convenience we refer to this body of law as 'DP legislation'.

We expect to amend this policy as new legislation is passed, and as further guidance is given for example when the appropriate arrangements are made for the effect of the UK exiting the European Union.

### **Who we are**

Town Legal LLP ("we, our, the firm") is a data controller for the purposes of the DP legislation. We are registered with the UK Information Commissioner's Office with registration number ZA221370. Our Data Privacy Partner is Elizabeth Christie and her deputy is Raj Gupta.

### **Your data privacy rights**

You have the right to access personal data that we hold for you and can find out more about your rights under the DP legislation at [www.ico.org.uk](http://www.ico.org.uk).

If you have any requests concerning your personal information or any queries concerning our processing, please contact us at [town.centre@townlegal.com](mailto:town.centre@townlegal.com) or in writing to our Data Privacy Partner, 10 Throgmorton Avenue, London EC2N 2DL. We will respond to your enquiry within 30 days unless the query is complex.

You will not have to pay a fee to access your personal information (or to exercise any other right as data subject). However, we may charge a reasonable fee, if your request is clearly unfounded or excessive.

### **How we collect personal data**

Personal data is information that identifies a living person whether directly or indirectly.

We collect such personal information in the course of our business from or about a number of different categories of people both directly and indirectly. This includes:

- where our clients are individuals, those clients, and
- people who work for our clients.

We do not make decisions based on automatic profiling and have no immediate plans for this to change.

### **What we collect**

We collect personal information which can include one or more of the following:

- basic information such as your name, title or position, and related information such as the organisation you work for;
- how to contact you by phone, email or post;
- identification information collected as part of our business acceptance process – please note that we may use anti-money laundering information from Experian but only with your consent; Experian process data in accordance with the Credit Reference Agency Information Notice;
- financial information such as payment related information;
- information to help us help you when you attend events such as access or dietary requirements; and
- any other information relating to you from public sources and/or provided to us by you.

From time to time this information may include special category data which the law requires us to treat with extra care. Special category data can include information about your health, racial or ethnic origin, religious or political beliefs, trade union membership, sex life or sexual orientation.

### **What we do with your information**

We process personal information for the purpose of providing legal services to you and also for our own business purposes including:

- to provide information requested by you;
- disclosures to our regulators, auditors, our own legal or professional advisors, our insurers and insurance brokers; and
- fraud prevention (including money laundering and bribery) and for the prevention or detection of crime (although use of any CCTV on our premises is the responsibility of our landlord).

### **What is the basis for processing your data?**

We will only process your personal data where we have a lawful basis for doing so. This is set out in the DP legislation. The lawful basis will be one or more of the following, that the process is necessary:

- for compliance with our legal and regulatory obligations;
- to pursue our legitimate interests;
- for establishing, exercising or defending legal claims; or
- to perform a contract for the provision of legal services to which you are a party directly (or to which our client is a party) or taking steps prior to entering into such a contract;

### **Transfer of personal data**

We do not routinely transfer personal data outside the European Economic Area ('the EEA') but may do so in the future. The level of protection of personal data in some countries outside the EEA is often lower than that within EEA countries. We will take all reasonable steps to ensure that any personal data that is transferred is treated securely and in accordance with this policy.

### **Security**

We use trusted IT suppliers to protect and preserve the data we process and control. They employ up-to-date data storage and security techniques to protect your personal information from unauthorised access, improper use or disclosure, unauthorised modification or unlawful destruction or accidental loss. All our employees and any third parties we engage to process your personal information are obliged to respect the confidentiality of your personal information.

### **Storage and disposal of personal data**

We hold personal data and other information for different periods reflecting both good data protection practice and our regulatory, statutory and contractual requirements. These periods are set out in our data retention policy, which is revised from time to time. Please contact us if you would like to know the retention period for your own data.

Personal data supplied for the purpose of due diligence checks is used only for that purpose and destroyed five years after the termination of the business relationship between us.

### **Changes to this policy**

We reserve the right to update this privacy notice at any time. The most up to date version will be available on our website.

**Town Legal LLP**  
**February 2020**