DAVIS WOOLFE

DAVIS WOOLFE: CLIENT PRIVACY POLICY STATEMENT

In this Privacy Policy the terms, 'we' or 'us' is Davis Woolfe Limited

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 ZA525901.

Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

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 website, in writing or over the phone.
- If you request information or assistance from us.
- We receive from third parties involved in your matter and any representatives you choose to liaise with us, including experts, counsel and family/ friends (as appropriate).

What personal information we process

This includes:

- Personal details such as your date of birth, address, National Insurance number, telephone number and email address.
- Identity information such as your passport, driving licence, utility bills or national identity card.
- 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.
- Information regarding your case in order for us to adequately represent you with your legal issue(s).
- CCTV footage if you enter into the building in which the office is situated. The data is captured by the Landlords of the Building.

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, 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.

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

PURPOSE	LEGAL BASIS
Providing a service and internal processing	
To assess your needs and provide you with suitable products and services	• Contractual obligation to provide you with, or a proposal including a cost estimate • Where special categories of personal data are processed, these are necessary to assess your needs
To service and administer your matter including billing	• Legitimate interests to provide and manage the service
To verify the identity of our clients	• To comply with legal obligations to prevent money laundering
To confirm, update and improve our client records	• To comply with legal obligations in the Data Protection legislation
To provide you with any information on the services that you have requested	• To meet our contractual obligation to provide information on the services you have requested
Relationship Management	

To manage and develop our relationship with you	• Legitimate interest to service your matter and improve our service to you
To inform you of products, services and events that may be of interest to you, where you have chosen to be made aware of this	• With your consent
Training and development	
For training purposes and to improve our service to you	• Legitimate interests to improve our services and develop our employees
Complying with Legal Obligations	
To prevent, investigate and prosecute crime, fraud and money laundering	• To comply with legal obligations for prevention of financial crime, money laundering and the facilitation of tax evasion.
For auditing purpose	• To comply with our legitimate interest to conduct audits
If we are obliged to disclose information by reason of any law, regulation or court order	• To comply with legal obligations
Other	
To transfer information to any entity which may acquire rights in us	• Legitimate interests for commercial interests
For any other purpose to which you agree.	• With your consent

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:

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Type of personal Information	Retention Period
General personal data which includes your normal personal data, personal identity and personal financial data	• 7 years after the end of our business relationship with you, or the end of your matter which ever comes later • Save for in the case of trusts, where we will retain information for the period of 12 years after the end of the trust period • Some information will be retained indefinitely, such as Wills, documents of ownership and files relating to minors
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	• 7 years after the end of our business relationship with you, or the end of your matter which ever comes later • Save for in the case of trusts, where we will retain information for the period of 12 years after the end of the trust period
Special categories of personal data	• 7 years after the end of our relationship with you
CCTV – digital images if you visit our offices	• 30 days

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.
- 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.
- Solicitors involved in your transaction representing other party(ies) in your matter to enable them and us to fulfil our obligations to you.
- Third parties who you involve in any proceedings, including family friends, with your consent.
- 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.

Updates

We will keep this Privacy Policy under review and make updates from time to time. Any minor changes to this Privacy Statement will be posted on this page and we will communicate any major changes to you.

Cookies

Our website uses cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our Website).

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).

Contact us

You can contact us by writing to us at:

Davis Woolfe Limited
1 King William Street
London
EC4N 7AF

Alice Thomas, Data Protection Manager: at@daviswoolfe.com

Telephone queries can be made to 020 3874 2858