

Privacy Notice

This Notice explains how we may collect and use information about you, and tells you about your privacy rights and how the law protects you.

1 Purpose of this Notice

- 1.1 This Notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read this Notice carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.2 It is important that you read this Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Notice supplements the other notices and is not intended to override them.

2 The Firm

- 2.1 Adams & Remers LLP is a limited liability partnership registered in England and Wales, with offices in Lewes and London. Registration No: OC351800. Registered Office: Trinity House, School Hill, Lewes, Sussex, BN7 2NN. VAT number GB 190 1257 81.
- 2.2 Adams & Remers LLP is authorised and regulated by the Solicitors Regulation Authority (SRA) and maintains professional indemnity insurance cover in accordance with the SRA. Details of our insurers and the territorial coverage of our insurance policy are available for inspection at our offices.
- 2.3 The word “partner” in relation to Adams & Remers LLP means a member of Adams & Remers LLP, or an employee or consultant with equivalent standing and qualifications. The term “Partner” is only used to designate seniority in historically familiar terms. A list of the members of Adams & Remers LLP and their professional qualifications is open to inspection at our offices. The members are not practicing in general partnership.
- 2.4 Any reference throughout this Notice to “Adams & Remers”, “firm”, “we”, “our” and any other collective noun describing our practice, means Adams & Remers LLP.

3 Data Controller

- 3.1 Adams & Remers LLP acts as the data controller and is responsible for any personal data you supply to us.
- 3.2 We have appointed a Data Compliance Officer (“DCO”) who is responsible for overseeing questions in relation to this Notice. If you have any questions about this Notice including any requests to exercise your legal rights, please contact the DCO on 01273 480616.

4 The data we collect about you

- 4.1 Personal data or personal information, means any information about an individual from which the person can be identified. It does not include data where the identity has been removed (anonymous data).
- 4.2 We may collect, use, store and transfer different kinds of personal data about you as follows:
 - 4.2.1 **identity information** such as your first name, maiden name, last name, marital status, title, date of birth and gender;
 - 4.2.2 **contact information**, which includes your address, email address and telephone numbers;
 - 4.2.3 **financial and transactional information** including your bank account details and payment card details, and details about payments to and from you and other details of services we have provided to you;
 - 4.2.4 **technical data** including the Internet protocol (**IP**) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - 4.2.5 **website usage data**, including information about how you use our website, including the full Uniform Resource Locators (**URL**) clickstream to, through and from our site (including date and time); properties you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us;
 - 4.2.6 **marketing and communications information**, including your preferences in receiving marketing from us and your communication preferences; and
 - 4.2.7 **data required to carry out your transaction**, following an instruction to act on your behalf.

Further detail about the information we collect and process about you is outlined in the [Data Protection Overview](#).

- 4.3 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.
- 4.4 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with legal services).

5 How do we collect your personal data?

- 5.1 We use different methods to collect data from and about you including through:
 - 5.1.1 **direct interactions:** you may give us your identity, contact and financial information by meeting with us in person, corresponding with us by post, phone, email or otherwise, or by filling in forms (in hard copy or via our website). This includes personal data you provide when you request us to provide services, subscribe to our publications, request marketing to be sent to you or provide feedback to us;
 - 5.1.2 **automated technologies or interactions:** if you use our website, and as you interact with it, we may automatically collect technical and usage data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [Cookie Policy](#) for further details.

- 5.1.3 **third parties or publicly available sources:** we may receive personal data about you from various third parties and public sources such as:
- (a) **identity and contact information obtained from** Companies House and other solicitors who may provide identity and contact information (including your address, email address and telephone number). These are required when carrying out money laundering checks. Information may also be passed to us as a result of a referral from a third party;
 - (b) **financial and transactional information obtained from** banks and financial institutions who may provide financial and transactional information including your bank account details and payment card details, and details about payments to and from you and other details of services we have provided to you;
 - (c) **technical data** from analytics providers such as Google and search information providers such as Google, Bing and Yahoo. This data includes the Internet protocol (**IP**) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - (d) **usage data from analytics providers such as Google**, including information about how you use our website, including the full Uniform Resource Locators (**URL**) clickstream to, through and from our site (including date and time); properties you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us;

6 How will we use the information about you?

Purposes for which we will use your information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 6.1 where we need to perform the contract to provide legal services we are about to enter into or have entered into with you;
- 6.2 where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests. Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service. We ensure that we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law);
- 6.3 where we need to comply with a legal or regulatory obligation: this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for this. Where we rely on consent, this means that you have provided clear, recordable consent that permits us to collect specific, limited personal data about you for specified purposes. You have the right to withdraw consent to marketing at any time by contacting us.

- 6.4 We have set out in the [Data Protection Overview](#) a description of all of the ways we will use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. We have established the following personal data control mechanisms:

- 6.5 **marketing communications from us:** we will send relevant marketing communications to you which may contain legal updates, event details and information that is relevant to the nature of our relationship. The legal basis under which we do this is Consent. When we send marketing communications you will have the opportunity to update your preferences and also provide consent.
- 6.6 **third party marketing:** we do not sell your personal data to third parties for marketing purposes.
- 6.7 **opting out:** you can ask us to stop sending you marketing communications at any time by following the unsubscribe links on any communication emailed to you, or by emailing reception@adamsandremers.com at any time with your request. Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of us providing legal services to you or other financial transactions.
- 6.8 **automated decision making and profiling:** your data will not be used by Adams & Remers in relation to automatic decision-making and profiling.

Cookies

If you access or use our website (www.adamsandremers.com), we may use cookies to collect and process your technical and usage data. For more information about the cookies we use, please see our [Cookie Policy](#).

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on 01273 480616.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 Who will have access to my personal data?

Internal sharing

Employees of the Firm may be given access to your personal data for the purposes of providing legal services; undertaking money laundering checks and billing. Their use is always limited to the performance of their duties as employees, and all employees are required to keep that information confidential and are not permitted to use it for any purposes other than those stated.

External third parties

We may share your information with the third parties below:

- 7.1 service providers acting as processors who provide the following services:
 - 7.1.1 email marketing software supplier for the purpose of sending e-newsletters;
 - 7.1.2 IT service supplier for the purpose of providing IT and system administration services;
 - 7.1.3 analytics and search engine providers who assist us in the improvement and optimisation of our website;
 - 7.1.4 companies which provide services to enable us complete your legal transaction, including dictation services, money-laundering check service

- provider, fraud prevention agencies, payment processors, property search agencies;
 - 7.1.5 government agencies such as Land Registry, Companies House, HMRC and Probate Registry;
 - 7.1.6 software providers;
 - 7.1.7 other solicitors, advisors and parties to a transaction.
- 7.2 professional advisers acting as processors or joint controllers including other lawyers, bankers, brokers, auditors, insurers, patent and trade mark agents, and barristers based in and outside of the UK who provide consultancy, banking, legal, insurance, accounting and other advisory services;
- 7.3 HMRC, SRA, Companies House, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers and professional advisors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also disclose your personal information to third parties:

- 7.4 in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- 7.5 if Adams & Remers or substantially all of the company's assets are acquired by a third party, in which case personal data held by that company about its customers will be one of the transferred assets;
- 7.6 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business or the terms applicable to the use of our website, and other agreements; or to protect the rights, property, or safety of Adams & Remers, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

8 International transfers

- 8.1 None of our external third parties with whom we may share your personal data are based outside of the European Economic Area ("EEA").

9 Data security

- 9.1 See [Data Protection Overview](#) Document for details of where we store your personal data.
- 9.2 We have put in place appropriate security and organisational measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 9.3 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10 Data Retention

- 10.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.
- 10.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we

process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

- 10.3 Details of retention periods for different aspects of your personal data are set out in the [Data Protection Overview](#).

11 What are your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are described in more detail below.

11.1 Right to access to your information

You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

You may contact the DCO, providing proof of identity and request confirmation that your personal data is being held and the nature of that data.

Adams & Remers will respond to you within one month and, under normal circumstances, there will be no charge.

11.2 Right of correction of your information

You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

You may contact Adams & Remers with details of any personal information that needs to be amended. Proof of that change of information may be requested.

The DCO will ensure that changes are made and will contact you to confirm. Adams & Remers will also inform third parties to whom we have disclosed such data of the amendments.

11.3 Right of erasure/right to be forgotten

You have the right to request the erasure of your personal information. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

You may contact Adams & Remers to request that your personal data held is erased. Our Data Protection Overview documents the locations in which personal data is stored, including our back-up systems. The DCO will ensure that your personal data is erased and will provide confirmation when this is completed.

Any third parties with whom we have shared your data will also be contacted and a request will be made for them to erase the data they hold.

Data will be deleted once the relevant retention period has expired.

11.4 Right of restriction of processing

You have the right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- 11.4.1 if you want us to establish the data's accuracy;
- 11.4.2 where our use of the data is unlawful but you do not want us to erase it;

- 11.4.3 where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- 11.4.4 if you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

You may contact Adams & Remers to request that your data is not processed until further notice. Any third parties with whom we have shared your data will also be contacted and a request will be made for processing to be restricted.

11.5 Right to be informed

You have the right to be informed about how we collect and use your personal data. This Notice details the way in which your data is held and processed by Adams & Remers.

11.6 Right to data portability

You have the right to request the transfer of your data to you or to a third party.

You may request your data in a machine-readable, electronic format in order to reuse it across different services. Adams & Remers will provide this information if requested, free of charge.

11.7 Right to object

You have the right to object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

11.8 Withdraw consent at any time

You have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

12 Other Websites

Our Website contains links to other websites. Clicking on those links may allow third parties to collect or share data about you. We do not control those third party websites and are not responsible for their privacy and cookie policies. When you link to other websites, you should read their own privacy policies.

13 Changes to this Privacy Notice

This version was last updated on 9 May 2018 and historic versions can be obtained by contacting us.

14 How to contact us

If you have any queries about this Privacy Notice or the data we hold about you, or if you wish to access any information we hold about you, please contact the DCO: reception@adamsandremers.com.