**PRIVACY NOTICE**

This Privacy Notice will help you understand how we collect, use and protect your personal information. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. If you have any queries about this Privacy Notice or how we process your personal information, please contact Graeme Fraser by e-mail : [graeme@gillianradford.co.uk](mailto:graeme@gillianradford.co.uk) or by post : Gillian Radford & Co, 453 Harrow Road, London W10 4RG marked for the attention of Graeme Fraser.

**Who we are**

Gillian Radford & Co is a registered ‘data controller’ and processes your data in accordance with the General Data Protection Regulation (also known as GDPR). Our registration number with the Information Commissioner’s Office is Z760341X.

**What information we collect about you**

The personal data you have provided, we have collected from you, or we have received from third parties includes:

* title, name, address, contact details: including:
  + telephone numbers,
  + email address;
  + employer and address history (if applicable)
* photographic ID, such as a driving licence or passport for the purposes of carrying out anti-fraud and anti-money laundering checks and verifying your identity;
* details of services we have been instructed to carry out for you including: written legal advice, the preparation of court documents, other written work and correspondence, court hearing bookings and previous and forthcoming conference arrangements;
* information received within papers relating to existing and previous legal proceedings;
* financial information such as your bank account details and bank statements;
* identifiers assigned to your computer or other devices, including your Internet Protocol (IP) address, which is used for fraud prevention and to improve customer experience.

When you contact us through any digital channel we will inform you of the methods used by each of those channels at the point of entry and at any point where we capture personal information.

**How we collect information about you**

Most of the personal information we hold about you is that which we collect directly from you, for example:

* each time you contact us about a potential piece of work;
* each time you formally instruct us on a piece of work/instruction;
* when you purchase our products or services;
* each time you interact with us, or respond to our communications or surveys;
* when you make enquiries or raise concerns with us;

**Registration**

For your peace of mind, we are happy to confirm that we do not rent, trade or sell email lists to other organizations or businesses.

In order to understand more about you and to fulfil our obligations to the relevant regulator, tax authority or revenue service (as is necessary for compliance with our legal obligations and/or in pursuance of our legitimate interests), some of the data that we collect from you, as well as other categories of data obtained from other sources, such as those listed below, may be processed by us:

* Solicitors Regulatory Authority ID, confirmation of regulation, notice of withdrawal of authorization or revocation of recognition, suspension or termination of practicing certificate or registration;
* Credit and claims history data, such as bankruptcy records and any county or high court judgments made against you (which are publicly accessible).

**What we use your information for and the legal base for processing**

We may store and use your personal information for the purposes of:

* administering your case: to contact you, to obtain or provide additional information; to check our records are correct and up-to-date and to check every now and then that you are happy and satisfied;
* as is necessary to perform a contract between you and us and/or as is necessary, in accordance with our legitimate interests;
* carrying out anti-fraud and anti-money laundering checks and verifying your identity (as is necessary for compliance with our legal obligations and/or as is necessary in accordance with our legitimate interests);
* using your payment details to process payments relating to your instruction, including fees and refunds (as is necessary to perform a contract between you and us and/or as is necessary in accordance with our legitimate interests);
* carrying out client conflict checks in relation to a potential new instruction(s) on our databases (as is necessary for the performance of a contract between you and us and/or as is necessary for compliance with our legal obligations and/or as is necessary in accordance with our legitimate interests);
* communicating with you about your instruction(s), including responding to your enquiries (as is necessary for the performance of a contract between you and us and/or as is necessary in accordance with our legitimate interests);
* administering debt recovery processes, where you owe us money under a contract or otherwise (as is necessary for the performance of a contract between you and us and/or as is necessary in accordance with our legitimate interests);
* fulfilling our obligations owed to a relevant regulator, tax authority or revenue service (as is necessary for compliance with our legal obligations and/or as is necessary in accordance with our legitimate interests).

Our "legitimate interests" as referred to above (and below) include our legitimate business and commercial interests in operating our business in a customer-focused, efficient and sustainable manner, in accordance with all applicable legal and regulatory requirements.

**Profiling**

We use the personal data you provide to us alongside information about you provided by third parties (please see “How we collect information about you” for further details).

This is necessary, for example, to allow us to carry out our fraud and/or money laundering checks.  Assessing the risk of such activity is essential to allow us to decide whether we are able to offer our services to you, as well as to identify suitable solicitors with the relevant level of expertise to meet your needs.

You have the right to contact us to express your point of view about this profiling activity (including providing any additional information that you want us to consider) and to contest such decisions. If you wish to exercise these rights, please contact us by emailing: [graeme@gillianradford.co.uk](mailto:graeme@gillianradford.co.uk) or by post: Graeme Fraser, Gillian Radford & Co, 453 Harrow Road, London W10 4RG

**Consequences of processing**

If we, or a fraud prevention agency, determine that you pose a risk of fraud or money laundering, we may refuse to provide the products or services you have requested. We may also stop providing existing services to you. A record of any fraud or money laundering risk will be retained by us and the fraud prevention agencies.  It may also result in others refusing to provide products, services, financing or employment to you.  If you have any questions about our processing of your data for fraud purposes, please contact Graeme Fraser at the details provided above.

**Who we share your data with**

Where relevant, given the nature of the products and services provided to you, we may also share your information with the following categories of third parties:

* third party service providers who we instruct for the purposes of handling cases, including solicitors, barristers, surveyors and experts (as is necessary for the performance of a contract between you and us);
* third party data suppliers, as explained under “How we collect information about you” (as is necessary in accordance with our legitimate interests);
* third party service providers who support the operation of our business, such as IT and marketing suppliers, financial service providers, file storage providers and shredding providers (as is necessary for the performance of a contract between you and us and/or as is necessary in accordance with our legitimate interests);
* the operators of claims/instructions related databases (as is necessary for the performance of a contract between you and us and/or as is necessary in accordance with our legitimate interests);
* fraud prevention agencies and associations, (as is necessary for compliance with our legal obligations);
* regulators and law enforcement agencies, including the Police, the Financial Conduct Authority, HM Revenue and Customs or any other relevant authority who may have jurisdiction (as is necessary for compliance with our legal obligations and/or as is necessary in accordance with our legitimate interests).

Please contact Graeme Fraser if you would like details of the agencies we share your data with. Email: [graeme@gillianradford.co.uk](mailto:graeme@gillianradford.co.uk) or by post: Gillian Radford & Co, 453 Harrow Road, London W10 4RG marked for the attention of Graeme Fraser.

**Processing outside of the European Economic Area (EEA)**

The personal information that we collect from you may be transferred to and processed in a destination outside of the EEA. It may also be processed by staff operating outside the EEA who work for one of our suppliers. In these circumstances, your personal information will only be transferred on one of the following bases:

* the country that we transfer the data to is approved by the European Commission as providing an adequate level of protection for personal information; or
* the recipient has agreed with us standard contractual clauses that guarantee the same levels of data protection as are required under our national legislation (including the GDPR); or
* there exists another situation where the transfer is permitted under applicable data protection legislation (for example, where a third-party recipient of personal data in the United States has registered for the EU-US Privacy Shield).

To find out more about how your personal information is protected when it is transferred outside the EEA (and if you wish to obtain details concerning the appropriate and suitable safeguards), please contact Graeme Fraser using the details above.

**How long information is kept**

We will retain your personal information for a number of purposes, as is necessary to allow us to carry out our business in accordance with our legitimate interests and/or as is necessary for compliance with our legal obligations.

Your information will be kept for 6 years on our main systems, after which time it will be archived, deleted or anonymized depending on the content of the material and whether there is any continuing need for it to be retained.  For example, some of the archived information may be retained for a further period of time in order to allow us to process your existing or future instructions

Any retention of personal data will be carried out in compliance with legal and regulatory obligations and with industry standards. These data retention periods are subject to change without further notice as a result of changes to associated laws or regulations.

Records created by us for fraud prevention purposes will be deleted 7 years after creation. Fraud prevention agencies can hold your personal data for different periods of time, depending on how that data is being used. If you are considered to pose a risk of fraud or of money laundering, your data can be held by fraud prevention agencies for up to 7 years from its receipt by them. Further information may be obtained by contacting those agencies.

If you have any questions in relation to the retention of your personal data, please contact Graeme Fraser: Email: [graeme@gillianradford.co.uk](mailto:graeme@gillianradford.co.uk) or by post: Gillian Radford & Co, 453 Harrow Road, London W10 4RG marked for the attention of Graeme Fraser.

**Your rights & responsibilities**

As the data subject of the data that we hold about you, you have the following rights and we have the following responsibilities:

**Rights**

* to obtain access to, and copies of, the personal information that we hold about you;
* to require that we cease processing your personal information if the processing is causing you damage or distress;
* to require us to erase your personal information;
* to require us to restrict or object to our data processing activities;
* to receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal information to another data controller; and
* to require us to correct the personal information we hold about you if it is incorrect.

**Responsibilities**

Gillian Radford & Co acknowledges its obligations as a data controller and data processor.

Please note that these rights may be limited by data protection legislation, and we may be entitled to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal information, please contact Graeme Fraser via Email: [graeme@gillianradford.co.uk](mailto:graeme@gillianradford.co.uk) or by post: Gillian Radford & Co, 453 Harrow Road, London W10 4RG marked for the attention of Graeme Fraser who will look into your complaint. If you remain dissatisfied, you are entitled to make a complaint to the Information Commissioner’s Officer.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website: [www.ico.org.uk.](https://ico.org.uk/)