

# WEBSITE PRIVACY POLICY

## CONTENTS

---

### CLAUSE

1. <i>Important information and who we are</i> .....	1
2. <i>Application</i> .....	2
3. <i>The data we collect about you</i> .....	3
4. <i>How is your personal data collected?</i> .....	4
5. <i>How we use your personal data</i> .....	4
6. <i>Disclosures of your personal data</i> .....	6
7. <i>International transfers</i> .....	7
8. <i>Data security</i> .....	7
9. <i>Data retention</i> .....	7
10. <i>Your legal rights</i> .....	7
11. <i>Glossary</i> .....	8

**1. Introduction**

2. Johns & Sagar LLP respects your privacy and is committed to protecting your personal data.

3. This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a PDF version of the policy here [LINK]]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. [*IMPORTANT INFORMATION AND WHO WE ARE*]

2. [*APPLICATION*]

4. 3. [*THE DATA WE COLLECT ABOUT YOU*]

5. 4. [*HOW IS YOUR PERSONAL DATA COLLECTED*]

6. 5. [*HOW WE USE YOUR PERSONAL DATA*]

7. 6. [*DISCLOSURES OF YOUR PERSONAL DATA*]

8. 7. [*INTERNATIONAL TRANSFERS*]

9. 8. [*DATA SECURITY*]

10. 9. [*DATA RETENTION*]

11. 10. [*YOUR LEGAL RIGHTS*]

12. 11. [*GLOSSARY*]

13.

**14. Important information and who we are**

**15. Purpose of this privacy notice**

16. This privacy notice aims to give you information on how we collect and process your personal data including any data you may provide through our website through either an enquiry form or an enquiry emailed to the firm.

17. It is important that you read this privacy notice together with any other privacy 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.

**18. Controller**

19. Johns & Sagar LLP is the data controller and responsible for your personal data (collectively referred to as, "we", in this privacy notice).

20. Your Story is the controller and responsible for this website.

21.

22.

23. We have appointed two Data Protection Individuals who are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact them using the details set out below.

24.

## 25. **Contact details**

26. Full name of legal entity: Johns & Saggar LLP

27. Names: Nicole McVicar and Joanna Alexiou

28. Email addresses: [n.mcvicar@johnsandsagggar.co.uk](mailto:n.mcvicar@johnsandsagggar.co.uk) and [j.alexiou@johnsandsagggar.co.uk](mailto:j.alexiou@johnsandsagggar.co.uk)

29. Postal address: 34-36 Grays Inn Road, London, WC1X 8HR, UK.

30. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 31. **Changes to the privacy notice and your duty to inform us of changes**

32. The data protection law in the UK will change on 25 May 2018. This privacy notice was last updated on the 18<sup>th</sup> May 2018 and will be reviewed regularly.

## 33. **Your duty to inform us of changes**

34. 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.

## 35. **Third-party links**

36. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

37.

## 38. **Application**

This Privacy Notice applies to information we collect about:-

- 1) Our clients;
- 2) Job applicants for an employed position;
- 3) Marketing campaigns; and
- 4) Visitors to our website.

## 39. **Data we collect about you**

40. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
41. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
- **Identity Data** includes (first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender).
  - **Contact Data** includes (home address, email address and telephone numbers).
  - **Financial Data** includes (bank account details)
  - **Transaction Data** includes (details about payments to and from you).
  - **Technical Data** includes (internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and other technology on the devices you use to access this website).
  - **Usage Data** includes (information about how you use our website).
  - **Marketing and Communications Data** includes (your preferences in receiving marketing from us and our third parties and your communication preferences).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### 42. **If you fail to provide personal data**

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 to perform the legal services we have with you.

#### 43. **How is your personal data collected?**

44. We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you enter into a contract with us or request marketing to be sent to you
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your browsing actions and patterns. We collect this personal data by using cookies,

[server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below
  - Technical Data from the following parties:
    - (a) analytics providers such as Google;
    - (b) advertising networks and
    - (c) search information providers such as Google.
- **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.
- **Identity and Contact Data from aggregators.**
- **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register.

**45. How we use your personal data**

46. We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [\[here\]](#) to find out more about the types of lawful basis that we will rely on to process your personal data. Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

47.

**48. Purposes for which we will use your personal data**

49. We have set out below, in a table format, a description of the ways we plan to 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.

50. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

51.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
-------------------------	---------------------	---

To take you on as a new client.	(a) Identity (b) Contact	Performance of a contract with you
To deliver our legal services to you, including : (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to fill out a feedback questionnaire.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use legal services)
To administer and protect our firm and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our firm, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the marketing we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our website and legal services, to develop them, to grow our firm and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

## Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **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 receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

## **6. Disclosures of your personal data**

The personal data obtained will be disclosed only to employees only as much as is reasonably necessary for the purposes set out in this Privacy Notice. In addition, your information may be disclosed:

- (a) To the extent that we are required to do so by law;
- (b) In connection with any legal proceedings or prospective legal proceedings;
- (c) In order to establish, exercise or defend our legal rights

Except as provided above, your personal data will not be disclosed to third parties.

52.

## **7, International transfers**

53. We do not transfer your personal data outside the European Economic Area (**EEA**).

54.

## **8. Data security**

55. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees and self-employed who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

56. 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.

57.

## **58. Data retention**

### **59. How long will you use my personal data for?**

60. 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.

61. 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.

62. Details of retention periods for different aspects of your personal data are available in our data retention guidelines which you can request from by contacting us.
63. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### 64. **Your legal rights**

- *[Request access of your personal data].*
- *[Request correction of your personal data].*
- *[Request erasure of your personal data].*
- *[Object to processing of your personal data].*
- *[Request restriction of processing your personal data].*
- *[Request transfer of your personal data].*
- *[Right to withdraw consent].*

If you wish to exercise any of the rights set out above, please contact us.

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### 65. **Glossary**

##### **LAWFUL BASIS**

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure 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). You can obtain further information about how we assess



our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## 66. YOUR LEGAL RIGHTS

67. You have the right to:

67.1 **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Any request to access or obtain copies of your personal data must be made in writing. We may ask you to verify your identity and provide further details about your request.

67.2 **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.

67.3 **Request erasure** of your personal data. 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.

67.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

67.5 **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

67.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

67.7 **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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

67.8

