# **PRIVACY POLICY**

The General Data Protection Regulations (GDPR) apply from 25 May 2018.

Achillea & Co is a data controller for the purposes of the GDPR and is registered with the Information Commissioner's Office (ICO). Our Data Manager is Mr A. Achillea who can be contacted by email at <a href="mailto:info@achillealaw.co.uk">info@achillealaw.co.uk</a>. Our registration number is Z1672406.

We are committed to protecting the privacy of all clients and visitors to our website. This privacy policy sets out the basis upon which personal data or information collected from or about you, or that you provide to us, may be collected and processed by (or on behalf of) this firm. Our standard terms of business also includes information about how your personal data is held by us.

This policy applies to personal information collected by us, or provided by you, through use of our website, your use of our professional services and/or during any communications with you.

Any changes we make to this policy will be posted on this page. If you have any queries in relation to this policy please contact us at <a href="mailto:info@achillealaw.co.uk">info@achillealaw.co.uk</a>.

Your personal information such as name, address, email address and phone numbers, may be collected by us in the course of our business through:

- Your attending meetings with us and/or during telephone calls to us, corresponding
  with us by letter or email, in which case we may retain the content of your letters
  and emails together with your email address and our responses
- Your supplying us with your personal information when engaging our services or by signing up to receive promotional information from us.

We may share your personal information with certain trusted third parties in accordance with contractual arrangements in place such as our professional advisers and auditors; suppliers to whom we outsource certain support services such as translation, photocopying and document review; our IT service providers; third parties engaged in the course of services provided to clients and third party search facilities for anti-money laundering checks. Where necessary your personal information may also be shared with regulatory authorities.

## SENSITIVE INFORMATION

We do not collect sensitive personal information from visitors to our website or from our clients, except where required by the terms of our engagement. If we do seek to collect sensitive information we will ask for your explicit consent to our proposed use of that information at the time of collection. "Sensitive personal information" means information about such topics as personal preferences, racial or ethnic origin, membership of political parties or movements, or other such sensitive topics as prescribed by the GDPR.

#### HOW WE USE YOUR PERSONAL INFORMATION

When you instruct this firm to act on your behalf on a matter your consent to our processing your personal data will be required. Processing your data may also be necessary as part of the contract you have with us and/or necessary for compliance with legal obligations to which we are subject such as anti-money laundering legislation. We shall use personal information and share it with partners, staff and external agents for the purpose of providing legal services to you. We shall also use and disclose personal

the purpose of providing legal services to you. We shall also use and disclose personal information so far as is required to carry out your instructions or as required by law. In doing so, we will process such personal information in accordance with this privacy policy and data protection legislation.

Where you provide us with or we obtain your personal information, we will normally keep your details on our server. In relation to certain uses, the server may be accessed by our staff and/or agents including those that may be located outside the European Economic Area (EEA) where the level of legal protection may not be as comprehensive. In such circumstances we shall ensure compliance with the data protection standards set out above as far as we are able.

We may use your personal information for the following purposes:

- To provide and/or administer legal services in accordance with your instructions
- To confirm identity
- To comply with legal and regulatory requirements including verifying the identity of new clients and existing clients to comply with applicable anti-money laundering regulations.
- To update our client records
- To provide information requested by you
- To notify you about important legal developments and services which we think you
  may find valuable, for sending you newsletters and/or similar marketing. We may
  contact you by post, fax, email, telephone or text message, (you may opt
  out/unsubscribe from such communications at any time by emailing us.
- Recruitment purposes.

As described in this policy, personal information will be retained by us and will not be sold, transferred or otherwise disclosed to any third party, unless required to continue your matter or such disclosure is required by law or court order.

Your personal data will be retained in accordance with our data retention policy which categorises all of the information held by us and specifies the appropriate retention period for each category of data.

If your personal information changes or you no longer wish to receive promotional information from us please let us know and we will correct, update or remove your details. This can be done by emailing us at the above address.

In providing services to you, we may process personal data on your behalf as a data processor for the purposes of the GDPR. Where we act as your data processor, we shall process personal data solely for the purposes as outlined above or otherwise in accordance with your instructions

We have in place technical and organisational security measures which are of a standard generally observed in the legal profession, including measures which guard against unauthorised or unlawful access to, alteration, disclosure or destruction of personal data and against accidental loss or destruction of or damage to personal data.

You confirm that you are authorised to provide to us the personal data which we shall process on your behalf.

## **SECURITY**

We use 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 employees and third parties or agents we engage to process your personal information are obliged to respect the confidentiality of your information.

We may disclose your personal information to our agents and/or service providers (some of which may be situated outside the EEA) for any of the purposes set out in this policy. For example, our information technology systems are operated by the firm but some data processing in relation to our IT services are carried out on our behalf by third parties. We endeavour to ensure appropriate security measures are in place to prevent unauthorised disclosure of personal information.

We will not sell your information to a third party, except in the unlikely event that we sell our business, or a substantial part of it; in which case we may sell your information as part of the sale to allow the purchaser to carry on providing some or all of our services to you.

#### **YOUR RIGHTS**

The GDPR entitles you to access the information we hold about you and, if the details are inaccurate, you may request rectification, erasure or restriction of processing. You should do so by writing to or emailing us. We will usually respond to requests free of charge but reserve the right to charge a nominal fee in certain circumstances such as excessive or repeated requests.

#### **USE OF COOKIES**

You can set your web 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 our website may become inaccessible or not function properly.

## AGREEMENT TO TERMS OF PRIVACY POLICY

By using our website and/or providing your personal information to us, you consent to the collection and use of your personal information by us as set out in this privacy policy.