



# Data Privacy Notice

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## 1 Introduction

- 1.1 A copy of this Data Privacy Notice is made available to all new clients upon receipt of instructions and to users of our website.
- 1.2 This Notice applies to current and former clients and does not form part of any contract to provide you with services. We may update this notice at any time and any changes to our privacy policy will be posted to our Company website. Please ensure that you check this for any updates or changes.
- 1.3 Please read the Notice carefully as it contains important information about who, how, and why we will collect, store, use and share your personal information. The Notice also details your rights in relation to your personal information and how to contact us and our supervisory authority in the event of a complaint.

## 2 Defined Terms

- 2.1 In this Data Privacy Notice:

**"Company"** FDR Law Limited and any successor practice and any service company owned or controlled by or on behalf of the Company or any of the Directors;

**"Data Controller"** the person or organisation that determines when, why and how to process Personal Data and responsible for establishing practices and policies in line with GDPR;

**"Data Protection Legislation"** Data Protection Act 2018, including the UK GDPR: the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK;

**"Data Protection Officer"** the person required to be appointed by the Company as detailed under the UK GDPR and having responsibility for data protection compliance;

**"Data Subject"** a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data;

**"Engagement Letter"** in relation to any Matter, the letter (or other agreement) recording the basis of our engagement;

**"Group"** FDR Law Limited and any other body corporate which is its holding company or subsidiary and any other body corporate which is a subsidiary of that holding company;

**"UK GDPR"** the Data Protection Act 2018, including the UK law version of the General Data Protection Regulation ((EU) 2016/679)(UK GDPR) as amended or updated from time to time.

**"Matter"** means any specific transaction, dispute or issue in relation to which you ask us to provide Services whether or not it has been defined in an Engagement Letter or other agreement;

**"performance of a 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;

**"Personal Data"** any information identifying a Data Subject or information relating to a Data Subject that we can identify, directly or indirectly, from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Special Category Data and Pseudonymised Data but excludes anonymous data or data that has the identity of an individual permanently removed. Personal Data can be factual and include details such as a name, email address, identification number, location, date of birth, an online identifier, Internet Protocol (IP) address or an opinion about that person's actions or behaviour.

Personal Data specifically includes, but is not limited to names, addresses, email addresses, online identifiers, dates of birth or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

<b>"Pseudonymised Data"</b>	means data where the information which directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person to whom the data relates cannot be identified without the use of additional information which is kept separate and secure;
<b>"Special Category Data"</b>	information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data and data concerning health, sex life or sexual orientation.
<b>"Services"</b>	means all Services we provide to you in relation to the relevant Matter;
<b>"we", "us", "our" and "FDR Law"</b>	means or refers to the Company and our Group.
<b>"you"</b>	the addressee of the Engagement Letter and any other person identified in the Engagement Letter as our client and "Your" shall have a cognate meaning.

### 3 Scope

- 3.1 FDR Law Limited is an independent law firm authorised and regulated by the Solicitors Regulation Authority, SRA No. 8003401, and is a company registered in England & Wales, Company No. 08980035. Our registered office is at 5 Palmyra Square South, Warrington, WA1 1BZ. FDR Law is registered with the Information Commissioner under registration number ZB624275.
- 3.2 This Privacy Notice together with our Terms of Business describe how the Company will collect and process your Personal Data whilst providing you with Services in accordance with Data Protection Legislation.
- 3.3 A current version of this document is available on the Company website.

### 4 Policy Statement

- 4.1 FDR Law will act as the Data Controller in relation to Personal Data used in our business for our own commercial purposes and provision of the Services and is responsible for your Personal Data.

- 4.2 FDR Law is committed to ensuring that all Personal Data will be processed in accordance with Data Protection Legislation at all times.
- 4.3 In accordance with the Data Protection principles, the personal information held about you will be:
  - used lawfully, fairly and in a transparent way;
  - collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
  - relevant to the purposes we have told you about and limited only to those purposes;
  - accurate and kept up to date;
  - kept only as long as necessary for the purposes we have told you about; and
  - kept securely.
- 4.4 We will only take instructions from you or any person that you have authorised in writing.

### 5 Procedure

- 5.1 We will collect, store, and use the following categories of personal information about you:
  - Full name and personal details (including ID, title, passport number, NI number, job title and date of birth)
  - Contact information (including address and address history, personal email address, home and mobile telephone numbers)
  - Financial details (including bank account details, bank statements to evidence funding, tax status information for fraud prevention purposes and payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information collected from publicly available resources and credit agencies)
  - Information about the services you have purchased from us and payments to and from you
  - Family and lifestyle circumstances if relevant to the Matter (including marital status, details of family members, planned holiday dates, understanding of English and family connections with politically exposed persons).
  - Information about your use of our IT, communication and other systems and monitoring information.
  - Details of your visits to our offices and CCTV footage
  - Information collected from your use of our websites such as profile data (including name, email address and contact details, details of the services or updates you request and marketing preferences) usage data (including details of the services you viewed or searched for, page

response times, download errors, length of visits and page interaction information) and technical data (including internet protocol address, browser type and version, time zone setting, browser plug in types operating systems and platforms).

5.2 It is important that the personal information we hold about you is accurate. Please keep us informed if your personal information changes during your working relationship with us.

5.3 In accordance with the type of Service being provided, we may also collect, store, and use the following categories of personal information about you together with any other documents or information relevant to your Matter:

- Commercial Property  
Company details, VAT registration numbers, shareholdings, directorship, utility bills and details of charges e.g. mortgage lenders.
- Residential Property  
Related transactions, property occupants and utility bills

5.4 We may also collect, store and use (subject to paragraph 6 below) the following Special Category Data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

## 6 Special Category Data

6.1 Special Category Data requires higher levels of protection and further justification for collecting, storing and using this type of personal information. We have put in place a data protection impact assessment and appropriate safeguards which we are required by law to maintain when processing such data.

6.2 We may process Special Category Data in the following circumstances:

- In limited circumstances with your explicit written consent.
- Where processing is necessary for us to carry out our legal obligations and to exercise specific rights of you or the Company in the field of employment and social security and social protection law.

- Where necessary to protect your or someone else's interests and you or they are not capable of giving consent.
- Where is it needed in the public interest, such as for equal opportunities monitoring.
- Where it is necessary for the establishment, exercise or defence of legal claims.
- Where you have made the data manifestly public.

6.3 The Company will not require your consent to use Special Category Data in accordance with this Notice to carry out our legal obligations or exercise specific rights. The lawful basis for this is legitimate interest and the interests of FDR Law representing you.

6.4 Where seeking consent, we will ensure that consent is freely given, specific, informed and an unambiguous indication of your wishes, statement or clear action showing agreement to the processing of their Personal Data.

6.5 In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

## 7 Failure to provide personal data

7.1 Where we need to collect Personal Data by law, or under the terms of our contract 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 to provide you with the Services. In this case, we may have to cancel our contract and will be unable to provide the Service you have with us, but we will notify you if this is the case at any time.

## 8 How your personal information is collected

8.1 We will collect personal information about you directly whilst we are performing Services in relation to your Matter and may also collect additional information from third parties, including credit reference agencies and or other background check agencies, as detailed below.

8.2 Information will be collected in a number of ways including:

- Directly from you.
- During the course of dealings with you for or on behalf of our clients.

- When you provide information to us by filling in forms on our website.
- When you contact us by telephone, in writing or in person, we may monitor and keep a record of that communication (in whatever form). All telephone calls are recorded, the caller is advised by an automated message and consent is confirmed at the beginning of the call.
- When we collect publicly available information about you or your business (including through electronic data sources such as bankruptcy search providers, credit reference agencies, Companies House or HM Land Registry).
- When we collect your Personal Data directly from third parties. For example our clients (such as information about their employees, family members, counterparties, your advisors and your suppliers) or trustees and legal representatives regarding beneficiaries or other parties involved in legal proceedings (such as the opponent's solicitor).
- Government agencies.
- From third parties where you have given permission to those third parties to share your information with us (such as bank or building society, financial advisors, consultants and other professionals).
- Where you have made that information publicly available online.
- As you interact with our website, we may collect data about your equipment, browsing actions, network, IP address and patterns using cookies, secure third-party tracking scripts and other similar technologies when visiting our website, registering to receive email updates, booking a seminar or workshop, responding to a survey or using any other service on our website.

8.3 When you provide Personal Data to us relating to any third party, you confirm that you have any necessary consents or authority to do so. You are responsible for ensuring that that provision of Personal Data complies with Data Protection Legislation and other applicable law. You must have the authority to disclose Personal Data if it related to someone else and all data disclosed should be complete, accurate and up to date.

## 9 How we will use your personal data

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

- Where we need to perform the contract we have entered into with you to provide Services in accordance with your instructions.

- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) for business or commercial reasons and your interests and fundamental rights do not override those interests. We make sure that we consider and balance any potential impact upon you before processing your data.
- Where you have given explicit consent to do so.

9.2 We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

9.3 Regarding the lawful basis for our processing, most commonly we will rely on the performance of a contract with you, or alternatively that the processing is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, or that the processing is necessary to comply with a legal obligation.

9.4 Generally we do not rely on consent as a legal basis for processing personal data other than to send marketing communications and/or to process special category data. You have the right to withdraw consent to marketing at any time by contacting us.

9.5 We have set out in the following paragraphs a description of all the ways we may 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.

9.6 We may process your personal data for more than one reason depending on the specific purpose for which we are using your data. Please contact us on at [DPO@fdrlaw.co.uk](mailto:DPO@fdrlaw.co.uk) if you need details about the specific ground on which we are relying to process your Personal Data.

9.7 We may create legal forms using applications on third party web servers (such as Practical Law) in the course of providing you with our Services. While we may enter your personal data in these legal forms, your Personal Data is not accessible by or retained by these third party providers and will never be shared.

9.8 We may in the following situations require the listed categories of personal information to allow us to perform our contract with you:

- To contact you in the course of providing you with our Services.
- To assess whether we can act on your behalf and assist you with your Matter, to determine the terms of engagement, to take steps to enter into a contract, to manage and administer the contract, to provide you with our Services and to ensure that our records are kept updated.
- To update and maintain client records.
- To deal with your enquiries and requests.
- To provide you with any information or Services that you request from us.
- If we are working on your Matter with other professionals including banks, mortgage lenders, estate agents, financial advisors etc. we will share data and disclose relevant data and information regarding your Matter where necessary. If you do not wish for us to do so, please notify your file handler in writing.

9.9 We may in the following situations require the listed categories of personal information to allow us to comply with our legal obligations:

- To comply with our legal and professional responsibilities and related disclosures, for activities relating to the prevention, detection and investigation of crime and comply with audits of regulatory bodies (such as conducting checks to identify and verify clients and their identity).
- To comply with court orders and exercise and/or defend our legal rights.
- To collect and provide information required by or relating to audits, enquiries or investigations by regulatory bodies.
- To ensure safe work practices including the rights and safety of our employees and clients.

9.10 We may in the following situations require the listed categories of personal information where it is necessary for the Company's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests:

- For monitoring and assessing compliance with our business policies and standards for internal compliance and security purposes.
- For insurance purposes.
- Staff education, training and development requirements and to analyse and improve our Services to you.
- Improving our business and Services by conducting analysis and research including data in relation to our financial performance, client base, work type or efficiency measures.
- To send client feedback forms or satisfaction surveys for monitoring and improving our Services.

- To comply with court orders and exercises and/or defend our legal rights.
- To enable access to all parts of our website, to notify you of any changes or developments to our website and to use, analyse information to administer, support, improve and develop our website (including troubleshooting, testing, system maintenance and support).

9.11 We may process your Personal Data and Special Category Data with your express consent to contact you to provide information about our Services, and to advise you of news and industry updates, events, promotions, reports, and other information, and to carry out market research that we hope will be of interest to you. For the purposes of market research, we will collect as little information as possible and will where possible, anonymise data.

9.12 We may in the following situations process Special Category Data:

- When you instruct us on a Matter where this information is relevant.
- To support your safety and wellbeing when we identify that, due to personal circumstance, your judgment may be impaired or you are or may be vulnerable to influence or exploitation.
- To ensure you are not disadvantaged when the Company is providing Services to you and to ensure you receive a proper standard of Service.
- Where this information is required to answer security questions.
- If you provide medical or dietary information when attending a meeting or event.

## 10 Marketing

10.1 We strive to provide you with choices regarding the use of your Personal Data for marketing purposes and may use your Personal Data to form a view on what we think you may want or need, or what may be of interest to you.

10.2 We may contact you while you are a client or during the retention period of your personal data concerning services (such as re-mortgaging) that we think may be of interest to you and are similar to the service we provide to you.

10.3 If you are a client or contact of FDR Law, we may contact you personally to notify you of changes in the law that might affect you or your business.

10.4 You may choose to opt in to receiving further marketing communications. You have the right to opt out of communications at any time by emailing the person dealing with your Matter, by following the opt-out links on any marketing message sent to

you or by emailing DPO@fdrlaw.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10.5 Where you opt out of receiving marketing communications, this will not apply to Personal Data provided to us as a result of Services provided to you.

10.6 We will never share your information with third party partners for their own marketing purposes.

## 11 Website links

11.1 Our website and client portal may contain links to other websites, plug-ins and applications run by other organisations. Please note that our privacy policy does not apply to those other websites. We are not responsible for the privacy practices of such other websites and advise you to read the privacy policy of each website which collects Personal Data.

## 12 Change of purpose

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

12.2 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.

## 13 Automated decision making

13.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration
- Where it is necessary to enter or perform a contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

13.2 If we make an automated decision on the basis of any particularly sensitive personal information, we must either have your explicit written consent or it must be justified in the public interest and we must also put in place appropriate measures to safeguard your rights.

13.3 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

13.4 We do not make any decisions about you solely using automated means, however, we will notify you if this position changes.

## 14 Sharing your data

14.1 We may have to share your data with third parties, including third party service providers where we have instructed them to process Personal Data on our behalf and other entities within our Group as part of our regular reporting activities on company performance, in the context of a business reorganisation, for system maintenance support and hosting of data. We require third parties to respect the security of your data and to treat it in accordance with the law.

14.2 We will only share Personal Data where required by law, where it is necessary for the performance of our contract with you or where we have a legitimate reason for doing so. This could include sharing data with the following:

- Solicitors Regulation Authority, our regulatory body.
- Lexcel and assessors (currently Recognising Excellence), to maintain a recognised quality standard for the practice.
- External auditors or examiners to ensure that we meet out legal, quality and financial management standards.
- Debt collection agencies.
- Courts, law enforcement authorities, regulators or other parties where necessary for the establishment, exercise or defence of legal proceedings.
- The Company's professional indemnity insurer.
- The Company's bank and financial advisor.
- Third party legal software and IT companies where necessary for the operation of our case management system.
- Third party digital dictation and transcription providers.
- Third party solicitors and self-represented parties.
- Professional advisers who we instruct on your behalf or refer to you including barristers,

accountants, tax advisors, mediators, surveyors or other experts and specialists.

- Other parties where necessary to carry out your instructions such as HM Land Registry and Companies House.
- Companies providing services for ID checks, money laundering checks and other fraud and crime prevention purposes.
- Companies who perform financial, bankruptcy or credit checks against you where necessary or appropriate in your matter, such as for onboarding you as a client. That may include a credit reference agency, which may keep a record of information and provide it, and the fact that search was made, to its other customers to assess credit risk and to prevent fraud, money laundering and to find debtors. For further information on how these agencies process your personal data, please refer to the [CRA Information Notice](#).
- Companies providing services to assist in the vetting of source of funds, especially in conveyancing transactions.
- Companies providing services for electronic signatures.
- Third party platforms and websites that facilitate the compilation or exchange of documents in your matter, for instance for purposes of disclosure in litigation work, enquiries in conveyancing matters, and preparing bundles of documents.
- Where we have offices in multi-occupancy buildings that you may visit, to building reception for security purposes.
- If we have collected your data in the course of providing a legal service to our client, we may disclose it to that client and where permitted by law to others for the purpose of providing those legal services.
- Third party service providers including beneficiary tracing agencies and actuaries.
- Tracing services such as DWP Letter Forwarding if we have lost contact with you.
- Translators and interpreters as necessary to overcome language barriers in your matter.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.
- Third party review sites and platforms to invite feedback and to assist us with analysing our performance.
- Legal directories, and advisors on directory submissions, for the purpose of ranking the Company.
- Third parties tracking providers to assist us with monitoring the usage of our website's

content and traffic by public users. Data shared with these companies is securely stored inside the UK, Ireland and European Economic Area (EEA), and contains pseudonymised data wherever possible - this includes network data, such as an IP address, which cannot be used to identify an individual. We work with several tracking providers, including, but not limited to: Google Analytics & Tag Manager, Lead Forensics, Facebook Pixel, Hotjar Heatmaps and LinkedIn Insights.

- Other Companies or bodies within our Group including: AIC Holdings Ltd, AIC Group Services Ltd, Taylor Rose TTKW Limited, Sir Kingsley Wood Ltd, SlothMove Ltd and TRMW Properties Ltd.

14.3 All third-party service providers and other entities within our Group are required to take appropriate security measures to protect your personal information in line with our policies. We remain responsible for your Personal Data and will use appropriate safeguards to ensure the integrity and security of your Personal Data. We do not allow our third-party service providers to use your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

14.4 We may share your personal information with other third parties, for example in the context of a possible sale or restructuring of the business. In this situation, we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your Personal Data with the other parties if and to the extent required under the terms of the transaction.

14.5 Where possible, data shared will be anonymised e.g. for market research purposes.

14.6 We may also share your personal data if we are under a duty to disclosure or share it to comply with any legal obligations, to detect or report a crime, to protect your vital interest, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and clients.

## 15 International transfers

15.1 In order to deliver services to you it may be necessary for us to transfer your Personal Data within or outside the European Economic Area (EEA), for example:

- if you or we have service providers or staff located elsewhere within or outside the EEA;
- if you are based elsewhere within or outside the EEA; and



- where there is an international dimension to the Matter on which we are advising you.

15.2 In such circumstances, it may be necessary to transfer personal data we collect to countries within or outside of the EEA. The European Commission outlines through its adequacy decisions those third countries to which personal data can flow from the EEA with or without the Article 46 GDPR transfer tool being necessary. Therefore, transfer of personal data to third countries is subject to appropriate safeguards that assure your personal data has the same level of protection as it does under the UK GDPR. Note though, we would only transfer personal data to third countries where it is necessary for the performance of our contract or for services we provide you, or it is necessary for the establishment, exercise or defence of legal claims. Transfer tools used may include one or more of the following: a data adequacy assessment, standard data protection clauses, binding corporate rules, codes of conduct, certification of mechanism, ICO standard contractual clauses or international data transfer agreements. Each transfer will be dealt with on a case by case assessment and, where appropriate, adequate transfer tools will be applied.

15.3 In certain circumstances we may need to ask your consent unless there is an overriding legal need to transfer the Personal Data.

15.4 When we transfer your information to other countries, we will use, share and safeguard that information as described in this Notice.

## 16 Data security

16.1 We have put in place appropriate security measures against unlawful or unauthorised processing of Personal Data, and against the accidental loss of, or damage to, Personal Data.

16.2 We limit access to your Personal Data to those persons who have a business need to know and they will only process your Personal Data on your instructions and are subject to a duty of confidentiality.

16.3 In the unlikely event of a data security breach such as data being lost or shared inappropriately, we have procedures in place to take appropriate action immediately to minimise any associated risk. We will notify you and any applicable regulator of a suspected data security breach if we are legally required to do so.

## 17 Data retention

17.1 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.

17.2 Information held in your file may be retained for different periods of time depending on the nature of your Matter and/or the purpose for which it was collected. When determining this period, we will consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure, the purposes we collected it for, and where required, for the establishment, exercise or defence of legal claims.

17.3 In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

17.4 Once you are no longer a client of the Company, we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

## 18 Data rights

18.1 In certain circumstances, you have rights under Data Protection Legislation in relation to your Personal Data. These are detailed below. If you wish to exercise any of these rights please contact the person responsible for your Matter in the first instance or the Data Protection Officer using the details set out in section 19.

18.2 You have the following rights in respect of your Personal Data:

### Right of access

18.3 You have the right to access your Personal Data, to receive a copy of the Personal Data we hold about you and to verify the lawfulness of processing. There are exceptions to this right and access could be denied.

### Right to rectification

18.4 You have the right to ask us to correct any Personal Data we hold about you where this is incomplete or inaccurate. We may need to verify the accuracy of the new data you provide to us. If this data has been shared with third parties, we will inform them of the rectification.

### Right to erasure

- 18.5 You have the right to ask us to delete or remove Personal Data where it is no longer necessary for us to continue to process it. You also have the right to ask us to remove or delete your Personal Data where you have successfully exercised your right to object to processing. If the data has been shared with third parties, we will inform them of the erasure.
- 18.6 We may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 18.7 Primary instances of your data in our electronic systems will be erased as swiftly as possible. Personal data in backup archives are protected by strong encryption and retained for as little time as necessary before being automatically deleted. Personal data may remain in our backup archives if it is impractical to isolate your individual data.
- 18.8 Please be assured that after your right to erasure has been exercised, your Personal Data will not be restored back to production systems except in certain rare instances such as the need to recover from a natural disaster or serious security breach. If this rare instance was to occur and your Personal Data was restored from backups, we will take the necessary steps to erase the primary instance of the data again.

### Right to restrict processing

- 18.9 You have the right to ask us to suspend processing 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.

### Right to data portability

- 18.10 You have the right to request the transfer of your Personal Data from us to you or to a third party. Upon receiving your instruction, we will send the data to you or the third party in a commonly used and machine readable format within one month of the request. 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.

### Right to object to processing

- 18.11 In certain circumstances, you have the right to object to the 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. We will stop processing your Personal Data in this situation immediately unless we demonstrate legitimate grounds for the processing which override your rights and freedoms.

### Right to withdraw consent

- 18.12 Where we are relying on your consent to the processing of your Personal Data, you have the right to partly or fully withdraw your consent at any time. This will not affect the lawfulness of any processing carried out prior to the date of your request. If you withdraw your consent, we may not be able to provide certain services to you and will advise you if this is the case at the time you withdraw your consent.
- 18.13 You will not usually have to pay a fee to access your Personal Data or to exercise any of the rights listed above. 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.
- 18.14 We will require specific information from you to help us confirm your identity and ensure your right to access your Personal Data or exercise any of your other rights is protected. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We will request proof of your identity and may also contact you to ask for further information in relation to your request to speed up our response.

- 18.15 We try to respond to all legitimate requests within one month. Occasionally it could 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.

## **19 Data Protection Officer**

- 19.1 We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice or our privacy practices please contact our Data Protection Officer using the details set out below.
- 19.2 Louisa Copsey is our Data Protection Officer and can be contacted at:

FDR Law Limited  
1-5 Palmyra Square South  
Warrington  
WA1 1BZ

E: [louisa.copsey@fdrlaw.co.uk](mailto:louisa.copsey@fdrlaw.co.uk)

19.3 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. The ICO can be contacted at [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/) or 0303 1231113.

19.4 We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 20 Changes

20.1 We keep our Privacy Notice under regular review.

20.2 We reserve the right to update and change this Notice from time to time in order to reflect any changes to the way in which we process Personal Data and in response to guidance and best practice advice issued by the ICO. Any changes to our privacy policy in the future will be posted to our Company website. Please ensure that you check this for any updates or changes.

*Please do not hesitate to contact us should you have any queries regarding this Notice or the Personal Data we hold about you.*

*Please let us know on the contact details above if you would like this notice in another format.*