



CP LAW SOLICITORS LTD

PRIVACY NOTICE

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Introduction

CP Law Solicitors respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how CP Law Solicitors collects and processes your personal data, including any data you may provide through our website or when you sign up to any newsletter or purchase any of our services. It is important that you read this privacy 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 privacy notice supplements the other notices and is not intended to override them.

Controller

Charles Platel & Partners (Solicitors) Limited, t/a CP Law Solicitors, a company registered in England & Wales with Company Number 03056856 and having its registered office at 2 Anvil Court, 50 Denmark Street, Wokingham, Berkshire, RG40 2BB is the controller and responsible for your personal data (collectively referred to as "CP Law Solicitors", "Charles Platel & Partners (Solicitors) Limited", "we", "us" or "our" in this privacy notice).

We have appointed a data protection representative (DPR) who is 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 rights, please contact the DPR using the details set out below.

Contact details

Our full details are: CP Law Solicitors Ltd, 2 Anvil Court, 50 Denmark Street, Wokingham, Berkshire, RG40 2BB.

Full name of legal entity: Charles Platel & Partners (Solicitors) Limited

Name or title of DPR: Mr Lee Pashen

email address: leep@cplaw.co.uk

Postal address: 2 Anvil Court, 50 Denmark Street, Wokingham, Berkshire, RG40 2BB

Telephone number: 0345 2413100

Changes to the privacy notice and your duty to inform us of changes

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.

2. The data we collect about you

Personal data, or personal information, 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).

In some circumstances, we are under a legal obligation to collect personal data from you. More generally, 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, marital status, title, date of birth and gender. This may include:
 - photographic identification such as copies of passport or driving licence; and
 - professional details (such as your business activities, job title, and professional experience).
- **Contact Data** includes billing address, delivery address, email address and telephone numbers or other contact information you provide to us from time to time.
- **Financial Data** includes bank account and payment card details and other information you provide to us from time to time, for example to enable us to process your instructions.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us or legal transactions we have processed for you.
- **Profile Data** includes any purchases or orders made by you; your feedback and any survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Category Information:** in certain of our practice areas, it may be necessary to obtain from you information which is referred to as “special category” information, pertaining to matters such as marital or relationship status, family circumstances, social circumstances, sexual orientation, racial or ethnic origins, genetic and biometric data, physical & mental health details, religious or such similar beliefs, trade union membership, and details of any criminal prosecutions or convictions.

We may require further information before we provide legal services, to comply with regulatory requirements. We may also collect personal data about you from publicly accessible sources such as Companies House, HM Land Registry, the Courts services and service providers for credit history and money laundering compliance.

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 we have or are trying to enter into with you for the provision of our professional services. In exceptional circumstances, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

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 or other information contained in the above categories by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns.

4. How we use your personal data

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:

- To register you as a client.
- Where we need to comply with a legal or regulatory obligation.
- To carry out your instructions or 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.
- To complete your feedback survey and to improve our products & services, website, marketing or customer relationships.
- To recommend products or services which may be of interest to you.

Purposes for which we will use your personal data

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.

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver our service 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 (f) special category information	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) to comply with mandatory laws and regulations
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(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 customers use our products/services)
To enable you to partake in a charitable endeavour, prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business (including troubleshooting, data analysis, support)	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, IT & banking network security, to prevent fraud and in the context of a

		business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Usage (d) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business) or as an adjunct to the proper provision of our services.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

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.

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 and where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data internally, or with external third parties. This might for example include sharing information with law searchers, legal counsel, medical experts, courts or tribunals, tracing agencies or private investigators, or with a specific expert identified as necessary to progress your case or comply with a court direction or order. We may also share your information if we are required to do so by law.

Categories of people/organisations we may share information with for the purposes set out in the table in section 4 above, include.

- (a) for the purposes of the prevention and detection of crime or fraud, our compliance with the Money Laundering Regulations and we may share your personal data with third party referencing agencies;
- (b) your own solicitors and any solicitors acting for the other side of the deal as is necessary to facilitate the sale, purchase, mortgage or letting or to enable us to provide our service;
- (c) in a chain transaction, we will at times be required to share your personal data, such as your name and address, with other law firms, legal advisors or solicitors;
- (d) we will disclose personal information that needs to be submitted to your lender or bank or their legal advisors or representatives in order to enable you to seek funding or if you are obtaining mortgage brokerage services;

- (e) we may disclose your information to certain insurance providers in order to obtain suitable quote for you;
- (f) we will be required to share your personal data with regulators, governmental organisations, with the courts, tribunals or law enforcement authorities;
- (g) we will share your personal data with any third party services providers who process personal data on our behalf so as to enable them to provide services to us – so that we in turn can provide our service to you. Please note this includes our information technology (IT) systems providers and contractors.
- (h) We may share your personal data with any person working as an employee of our business where that is necessary so as to enable them to provide our service to you.
- (i) We will store your personal data on our customer management systems and may use this to provide you with marketing information or details of services offered by us. However, you do have the opportunity to opt out of receiving this.
- (j) 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.
- (k) 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 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.

6. International Transfers

- 6.1 We may transfer, store and process your personal data outside of the United Kingdom with your consent, or if we are required to do so by law or to provide to you the service for which you have contracted. For example, it may sometimes be necessary to transfer personal data for international money transfers or to deal with property purchases or legal claims. This will depend on the circumstances of the case, but any such transfers of personal data will only be made in compliance with the law.

7. Data security

- 7.1 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, agents, contractors and other third parties 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.
- 7.2 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.

8. Data retention - how long will you use my personal data for?

- 8.1 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. We may need to retain personal data for some time to comply with the Solicitors Regulations or to comply with other laws by which we are governed. We may retain your personal data for a longer period to deal with an ongoing complaint or if we reasonably believe we may be subjected to potential litigation concerning our engagement with you.
- 8.2 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.

- 8.3 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.
- 8.4 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.

9. Your legal rights

9.1 Under certain circumstances, you have rights under Data Protection Act 2018 and UK GDPR in relation to your personal data. You have the right to:

- Request access to 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 where we are processing your personal data rather than its use pursuant to a contract or other lawful reason.

9.2 If you wish to enquire about exercising any of the rights set out above, please contact us. Please note that any request to us for details of the personal data that we hold on you must be made in writing, either by email or by recorded post.

9.3 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 (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.

9.4 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.

9.5 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.

9.6 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.