**General Privacy Policy**

We take the privacy of your personal data seriously and process it in compliance with the General Data Protection Regulation (GDPR).

**What type of personal data will we collect from you?**

The personal data we collect will depend on the nature of the services we are providing (if you are a client) or are considering providing (if you are a prospective client) and what we are contracted to do for you. Typically, this might include the following:

* Contact details (including your name, address, date of birth, landline and mobile telephone numbers, and email address)
* Photographic identification and proof of address documents (to carry out due diligence)
* Professional information (such as job title, previous positions, and professional experience)
* Banking and financial details (to establish the source of funds where a transaction is involved, or to make payments to you)
* Information relating to your individual enquiry for legal services from us

Where necessary to act in your best interests, provide legal services to you, and for the establishment, exercise, or defence of your legal matter, we may need to process personal data which is very sensitive in nature such as diversity and health-related details. In some circumstances, we may need to share this information with third parties, for example a court or tribunal. If you volunteer sensitive personal data, you will be allowing us to process it as part of engaging our services.

**On what basis can we process your personal data?**

We will process your personal data on the following bases:

* For clients, it is necessary for us to perform the contract between us. This is set out in our terms of business and client care letter.
* For prospective clients, it is necessary so that certain steps can be taken before entering into a contract with you.
* It is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you). These legitimate interests will include (for clients) checking for conflicts of interest (so that we do not act for clients where there would be a conflict of interest, as that would place us in breach of the SRA Code of Conduct) and (for both clients and prospective clients) retaining personal data in order to deal with any complaint or claim that is made about our service.
* It is necessary in order to comply with mandatory legal obligations to which we are subject under EU or UK law.

**Personal data collected from you about other people**

During your case, you may provide data about third parties, such as your family members, in which case we will use such data as a data controller in our own right and will comply with data protection legislation in relation to use of that data.  You must have the authority to disclose personal data if it relates to someone else and all data disclosed should be complete, accurate and up to date.

**What are we going to do with your personal data?**

We will hold and use personal data about you to:

* Verify your identity and establish the source of funding in any transaction.
* Carry out appropriate anti-fraud checks (by conducting online searches using a third-party identity provider).  Please note that this will not affect your credit rating.
* Communicate with you during the course of providing our services, for example providing you with advice and dealing with your enquiries and requests.
* Prepare documentation to complete transactions and commence and defend legal proceedings on your behalf.
* Carry out obligations arising from any contract entered into between you and third parties as part of your legal matter.
* Statistical purposes so we can analyse figures to help us manage our business and plan strategically for the future.
* Seek advice from third parties in connection with your matter, such as legal Counsel.
* Respond to any complaint or allegation of negligence against us.
* Prevent money laundering or terrorist financing in accordance with financial crime regulations.
* Improve the products and services we provide.

**How long we keep your personal data for**

We will only retain your personal data for as long as is necessary to:

* Carry out the legal work you have asked us to do.
* Establishment or defence of complaints or legal claims (for example negligence claims) that could be made against us.
* Compliance with legal obligations under EU/UK law (anti-money laundering regulations say your identification and source of funds information must be kept for a minimum period from conclusion of the matter)

We will keep your for a period of six years

**Who your personal data will be shared with**

We may, when required and necessary, share your personal data with other organisations.  Depending on the work we are undertaking for you the other organisations may include:

* Contractors from whom we obtain operational services including IT, message-taking, typing and secretarial support, costs draftsmen, secure document storage and shredding.
* Those that provide professional or commercial services, such as Counsel, other solicitors, accountants, medical practitioners, surveyors, interpreters and translators, estate and letting agents, and other experts
* Providers of insurance, financial and banking services to you and/or to our firm.
* HMRC, HM Courts & Tribunals Service, Councils and other national and local government bodies.
* The Solicitors Regulation Authority, the Information Commissioner’s Office (ICO), the Legal Aid Agency and organisations involved with the preparation, assessment and certification of quality standards for which our firm is seeking or maintaining accreditation, including Lexcel.

**Security of your personal data**

Your data will be held on secure cloud-based servers within the UK.

**Erasure of personal data**

Where we obtained your personal data to fulfil our contractual obligations to you, or if we have a legitimate interest for processing your personal data, we will erase that data as soon as it is no longer necessary to retain it in relation to the purpose for which it was originally collected.

**If you are not our client or a prospective client**

If you are not our client your personal data may be processed to enable us to provide legal advice to our client and may also be used in legal proceedings on behalf of our client. We are allowed to use your personal data because it is in the legitimate interests of our client (for example under the terms and conditions of a loan agreement) to do so. We may also have to use your personal data to comply with our own legal and regulatory obligations.

**Contacts**

If you have any questions about our privacy policies, want to exercise your right to see a copy of the information that we hold about you, think that information we hold about you may need to be corrected, want to delete all or any part of it or to object to the processing on legitimate grounds, please contact Peter Stringfellow at [peterstringfellow@stringfellowsolicitors.co.uk](mailto:peterstringfellow@stringfellowsolicitors.co.uk). While you do have the right to complain to the Information Commissioner (information is on the website [www.ico.org.uk](http://www.ico.org.uk/)), we would wish to deal with any concerns or complaints you may have, and so please do contact us first.

**Privacy Policy For Web Users**

Our Privacy Policy tells you what will happen to any personal data that you provide to us as a result of using this website. The information is written for the benefit of general visitors to the website - if you are a client of ours (or become one) we process a wider range of personal data and deal with a broader range of privacy-related issues.as detailed above.

How We Use Your Personal Data

We use the data you provide via this website to:

* **communicate with you**, for example: we use contact details such as email address or phone number when responding to enquiries made via online forms
* **monitor website trends**, for example: we use Google Analytics to help us aggregate traffic so we can monitor how the website is being used

Our "Lawful Reasons" For Processing Your Personal Data

The "General Data Protection Regulation" (GDPR) is the primary piece of legislation defining your rights over our processing of your personal information. The GDPR requires us to declare which of six "lawful reasons" we are relying on when we are processing your personal data: we operate on the basis of "legitimate interest" when communicating with you in other ways (e.g. when responding to your enquiry).

Questions or Complaints

In the first instance we hope you will contact us directly with any questions or complaints (contact details are displayed prominently on this website). However, legal rights regarding privacy are the remit of the Information Commissioners Office (ICO) and you will find more information about how to complain here: <https://ico.org.uk/concerns/>

Our Use of Google Analytics

We sometimes use Google Analytics to monitor how our website is being used so we can make improvements. Our use of Google Analytics requires us to pass to Google your IP address (but no other information) - Google uses this information to prepare site usage reports for us, but Google may also share this information with other Google services. In particular, Google may use the data collected to contextualize and personalize the ads of its own advertising network.