

# Privacy notice

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### 1. Introduction

This Privacy Notice explains how we will look after your data when you interact with us and tell you about your privacy rights and how the law protects you.

It is likely that this notice will be amended and updated from time to time so please feel free to ask for the most current version when you visit us in person or via our website.

This version is effective from 25 May 2018.

### 2. Who we are

Pollard Thomas Edwards LLP, is the data controller and is responsible for your personal data.

### 3. Processing your data lawfully

In order for us to look after your personal data we should have a reason under law for collecting and processing it. There are various ways we can do this including:

#### Consent

You have given us specific and clear consent to process your data for a specific purpose.

#### Contractual obligations

Processing your data is necessary for us to fulfil the obligations of a contract between us, or perhaps we are taking steps to enter into a contract together

#### Legal obligations

We are required by law to process your data

#### Legitimate Interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

#### Public task

The processing of your data is necessary for us to perform a task in the public interest or for an official function which has a clear basis in law.

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### 4. When do we collect your data?

- When you visit our website
- When you engage with us on social media
- When you contact us in writing by paper or digital means
- When you contact us by telephone
- When you apply to work for us
- When you fill in any forms we may give to you
- When you visit our practice, including CCTV
- When you use our guest wifi service
- When you engage with us in any business-related event outside of the practice

### 5. What data do we collect?

Personal data means any information about an individual from which you can be identified. We may collect, use, store and transfer different types of personal data about which we have grouped together as follows:

- Identify Data name, address, gender and date of birth, including copies of documents to prove your age, identity or right to work in the UK if the law requires us to
- Contact Data includes address, email address and telephone numbers
- Financial Data includes bank account details if you are a supplier or client
- Technical Data includes IP address and information gathered by the use of cookies in your web browser, or through access to our guest wifi.
- Usage Data includes information on your history with us as a client, supplier or visitor (either in person or through the website)
- Marketing and Communication data includes your preferences for receiving marketing from us, any third parties we may use and your communication preferences
- Social Media Data includes your username if you choose to interact with us that way

### 6. How, why and when we use your personal data

We will use different methods to collect data from you from time to time, including through:

- Direct Interaction. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, email, telephone or otherwise. This includes personal data you provide when you work with us on a project as a client, become a supplier, apply to work for us, engage with us socially at events or by other reasonable means.
- Automated Interaction. In using our website or our guest wifi we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies mainly by using Google Analytics. More information can be found in our Cookie Policy [here](#).
- Third parties or publicly available sources. We may receive personal data from you from various third parties and public sources

We will only use your personal data when the law allows us to. Most common 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.

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.

The table below provides more detailed information which you may find helpful but you may wish to contact us if you have a question specific to your own personal data.

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client or to hire you as a member of staff	Identity Contract	Performance of a contract with you
To invoice you as a client and pay you as a supplier:  Manage payments, fees and charges  Collect and recover money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  Notifying you about changes to our terms or privacy policy  Asking you for feedback, to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  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	Identity Contact Profile Usage Marketing and Communications Technical	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 use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical 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)

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### 7. Protecting your data

Data security is of the utmost importance to everyone. With this in mind we will treat your data with care and take all appropriate security measures to protect it.

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.

We have also 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. Retention of data

We will only collect your personal data for as long as necessary to fulfil the purposes we collect it for, including the purpose of satisfying any legal, accounting or reporting requirements.

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

At the end of any retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

### 9. Sharing your data

Sometimes we will share your data with trusted third parties. When we do so we only share personal data that is specific to the third parties services, they must only use the data to fulfil the purpose in our mutual contract and they should ensure they protect this data as we would. Examples of the kind of third parties we work with are:

- IT companies who support our business systems
- Google to analyse website traffic on our behalf and provide analytical information
- Professional advisors including lawyers, bankers, auditors and insurers all based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators, law enforcement agencies and other authorities based in the UK who require reporting of processing activities in certain circumstances.

### 10. Location of your data

We do not transfer your personal data out of the EEA at present, however if we do need to do so in future we will ensure that the country ensures an adequate level of data protection.

### 11. Your rights

Under certain circumstances you have rights under data protection laws in relation to your personal data. Further information can be found [here](#). If you wish to exercise any of the rights available to you please contact us. There is usually no fee and we will respond to you within one month. However under certain circumstances we may charge a reasonable fee and your enquiry may take longer. We will always confirm your identify and request certain information from you before any request is processed.

### 12. Questions or concerns?

We hope that the information contained in this Privacy Notice has been helpful to you and explained how we handle your personal data.

If you have questions please do get in touch with us, our contact details are shown below.

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