



## Wilsons Privacy Statement

### 1. Introduction

- 1.1. We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or our supervisory authorities in the event you have a complaint.
- 1.2. When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom). We are responsible as ‘controller’ of that personal data for the purposes of the GDPR. Our use of your personal data is subject to the GDPR, other relevant UK and EU legislation and with regard to our clients their instructions and our professional duty of confidentiality.

### 2. Key terms

- 2.1. It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Wilsons Solicitors LLP and our subsidiary companies
Our Data Protection Compliance Manager	Debbie Ashenhurst
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade union membership, health issues, Genetic and Biometric Data, sex life or sexual orientation, or criminal offences or convictions.

### 3. Overview

- 3.1. The nature and extent of the data we collect about you, how it is collected and stored, how and why it is used and shared and for how long it is kept will depend on whether you are a client, a representative of a client, a business contact or otherwise.

### 4. Personal data we may collect about you

- 4.1. We set out below the personal data we may collect.
- 4.2. Personal data we regularly collect:-



- 4.2.1. Your name, address and telephone number
- 4.2.2. Electronic contact details, eg your email address and mobile phone number
- 4.2.3. Information about your use of our IT, communication and other systems, and other monitoring information, eg if using our secure online client portal
- 4.3. Personal data we may collect where and depending on why we have been instructed you-
  - 4.3.1. Information relating to the matter on which you are seeking our advice or representation
  - 4.3.2. Information to enable us to check and verify identity, eg your date of birth or passport details Your National Insurance and tax details
  - 4.3.3. Financial details so far as required by the money laundering regulations or as relevant to your instructions including your ability to meet our invoices
  - 4.3.4. Bank and/or building society details
  - 4.3.5. Details of your professional online presence, eg LinkedIn profile
  - 4.3.6. Details of your spouse/partner and dependants or other family members, eg if you instruct us on a family matter or a will
  - 4.3.7. Your employment status and details including salary and benefits, eg if you instruct us on matter related to your employment or in which your employment status or income is relevant
  - 4.3.8. Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information, eg if necessary for compliance with the money laundering regulations
  - 4.3.9. Details of your pension arrangements, eg if you instruct us on a pension matter or in relation to financial arrangements following breakdown of a relationship
  - 4.3.10. Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), eg if you instruct us on matter related to your employment or in which your employment records are relevant
  - 4.3.11. Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs, eg if you instruct us on discrimination claim
  - 4.3.12. Personal identifying information, such as your hair or eye colour or your parents' names, eg if you instruct us to incorporate a company for you
  - 4.3.13. Your medical records, eg if they are material in court proceedings or for tax planning
- 4.4. This personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.



## 5. How your personal data is collected

- 5.1. We collect most of this information from you direct. However, we may also collect information:
  - 5.1.1. from publicly accessible sources, eg Companies House or HM Land Registry;
  - 5.1.2. directly from a third party, eg:
    - 5.1.2.1. sanctions screening providers;
    - 5.1.2.2. client due diligence providers;
  - 5.1.3. from a third party with your consent, eg:
    - 5.1.3.1. your bank or building society, another financial institution or advisor;
    - 5.1.3.2. consultants and other professionals that you or we may engage in relation to your matter;
    - 5.1.3.3. your employer, professional body or pension administrators;
    - 5.1.3.4. your doctors, medical and occupational health professionals;
    - 5.1.3.5. your authorised agent(s)
  - 5.1.4. via our website—we use cookies on our website (for more information on cookies, please see our website privacy statement published on our website)
  - 5.1.5. via our information technology (IT) systems, eg:
    - 5.1.5.1. case management, document management and time recording systems;
    - 5.1.5.2. automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems;
    - 5.1.5.3. via our secure online client portal

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

- 6.1. Under data protection law, we can only use your personal data if we have a proper reason for doing so, eg:
  - 6.1.1. where you have given consent;
  - 6.1.2. to comply with our legal and regulatory obligations;
  - 6.1.3. for the performance of our contract with you or to take steps at your request before entering into a contract; or
  - 6.1.4. for our legitimate interests or those of a third party.
- 6.2. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.



6.3. The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide legal services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
<p>Conducting checks to identify our clients and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulator</p>	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, ie to protect our intellectual property and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our practice, eg in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	<p>For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
Updating and enhancing client records	For the performance of our contract with you or



What we use your personal data for	Our reasons
	<p>to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our clients about existing and new services</p>
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> <li>–existing and former clients;</li> <li>–third parties who have previously expressed an interest in our services;</li> <li>–third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests or those of a third party, ie to promote our business to existing and former clients
External audits and quality checks, and the audit of our accounts	<p>For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

6.4. The above table does not apply to special category personal data, which we will only process with your explicit consent.

## 7. Promotional communications

7.1. We may use your personal data to send you updates by email, text message, telephone or post about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services.



- 7.2. We have a legitimate interest in processing your personal data for promotional purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.
- 7.3. We will always treat your personal data with the utmost respect and never share it with other organisations other than contractors or agents that we occasionally use for the sending out of e-newsletters or event invitations.
- 7.4. You have the right to opt out of receiving promotional communications at any time by:
  - 7.4.1. contacting us by email addressed to "marketing@wilsonslp.com" or writing to Marketing, Wilson's, Alexandra House, St John Street, Salisbury, SP1 2SB
  - 7.4.2. using the 'unsubscribe' link in e-newsletters or electronic event invitations
- 7.5. We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

## 8. Who we share your personal data with

- 8.1. We routinely share personal data with:
  - 8.1.1. professional advisers who we instruct on your behalf or refer you to, eg barristers, medical professionals, accountants, tax advisors or other experts;
  - 8.1.2. other third parties where necessary to carry out your instructions eg your mortgage provider, Companies House, or HM Land Registry in the case of a property transaction;
  - 8.1.3. our subsidiary companies: Wilson's (Company Secretaries) Limited, and Wilson's Trust Corporation Limited;
  - 8.1.4. our insurers and brokers;
  - 8.1.5. external auditors, eg in relation to quality assessments and the audit of our accounts;
  - 8.1.6. our bank;
  - 8.1.7. external service suppliers, representatives and agents that we use to make our business more efficient, eg, marketing agencies, analysis suppliers, cloud providers, software providers.
- 8.2. We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.
- 8.3. We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.
- 8.4. We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information



will be anonymised but this may not always be possible. The recipient of such information will be bound by confidentiality obligations.

## 9. Where your personal data is held

- 9.1. Information may be held at our offices and those of our subsidiary companies, third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with').

## 10. How long your personal data will be kept

- 10.1. We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. As a general guideline we will not hold your data for more than six years unless there is a specific need or you instruct us to do so. When it is no longer necessary to retain your personal data, we will delete or anonymise it.
- 10.2. We will keep your personal data after we have finished advising or acting for you. We will do so for one of the following reasons:
- 10.2.1. to comply with your instructions;
  - 10.2.2. to respond to any questions, complaints or claims made by you or on your behalf;
  - 10.2.3. to show that we treated you fairly;
  - 10.2.4. to keep records required by law.

## 11. Your rights

- 11.1. You have the following rights, which you can normally exercise free of charge:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations



To object	<p>The right to object:</p> <ul style="list-style-type: none"> <li>–at any time to your personal data being processed for direct marketing (including profiling);</li> <li>–in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.</li> </ul>
Not to be subject to automated individual decision-making	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p>

- 11.2. For further information on each of those rights, including the circumstances in which they apply, please contact us or contact the Information Commissioner's Office for guidance.
- 11.3. If you would like to exercise any of those rights please contact our Data Protection Compliance Manager to let us know which right you want to exercise and the information to which your request relates. On receipt of such a request we will almost always ask you to:-
- 11.3.1. let us have enough information to identify you - *eg your full name, address and client or matter reference number*; and
  - 11.3.2. let us have proof of your identity and address a copy of your driving licence or passport and a recent utility or credit card bill
- 11.4. **Please do not however provide any proof of identity and address documentation until requested to do so by our Data Protection Compliance Manager.**

## 12. Keeping your personal data secure

- 12.1. We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 12.2. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## 13. How to complain

- 13.1. We hope that we or our Data Protection Compliance Manager can resolve any query or concern you may raise about our use of your information.
- 13.2. The General Data Protection Regulations also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged





infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

#### 14. Changes to this privacy statement

14.1. This privacy statement was published on 25 May 2018. We may change this privacy statement from time to time and any changes will be published on our website.

#### 15. How to contact us

15.1. Please contact us or our Data Protection Compliance Manager by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

15.2. Our contact details are shown below:

Our contact details	Our Data Protection Compliance Manager's contact details
Wilson Solicitors LLP Alexandra House St Johns Street Salisbury SP1 2SB 01722 412 412 enquiries@wilsonslp.com	<b>Debbie Ashenhurst</b>  <b>01722 412 412</b>  <b>debbie.ashenhurst@wilsonslp.com</b>