

WILLIAMS & CO. respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to what we do with your personal data.

1. Purpose of this Privacy Policy

This privacy policy explains what Williams & Co. does with your personal data.

It is important that you read this privacy policy together with any other privacy policy 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.

2. Controller

Williams & Co. is the Data Controller in respect of the personal data which you provide to it or which it receives about you in the course of providing services to you

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact Lesley Williams using the details set out below.

3. Contact Details

Williams & Co
Cavendish House
369 Burnt Oak Broadway
Edgware
Middx HA8 5AW

Miss Lesley Williams

Email: lesley.williams@lawlegal.co.uk

020 8952 8882

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 at (www.ico.org.uk).

4. Changes to the Privacy Policy and your duty to inform us of changes

- We may make changes to this privacy policy from time to time. We will post any updated versions of this privacy policy on our website (www.lawlegal.co.uk). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

5. The Data that we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have categorised as follows:

- **Identity Data** which includes:- first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** which includes:- billing address, delivery address, email address and telephone numbers.
- **Financial Data**:- which includes: bank accounts and payment card details.
- **Transaction Data** which includes:- details about payments to and from you and other details relating to the legal services we provide for you and for which you pay us.
- **Special Categories of Personal Data**:- we may collect any special categories about you, including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We may also collect any information about criminal convictions and offences. Where we collect and process special categories of personal data relating to you, we do so because such processing is necessary for the establishment, exercise or defence of legal matters relevant to you.

6. If you fail to provide Personal Data

Where we need to collect personal data by law, or under the terms of the work we do for you and you fail to provide that data when requested, we may not be able to continue providing legal advice services to you. In this case we may have to withdraw from representing you.

7. How is your Personal Data collected?

We use different methods to collect data from and about you including through:

a) Direct interactions

You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you give us to enable us to conduct your matter.

b) Third parties or publicly available sources

We may receive personal data about you from various third parties including:

- (i) other parties to your matter including the court, social services, the police;
- (ii) search engines; and
- (iii) publicly available sources such as Companies House and the Electoral Register.

8. 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:

- a) Where we need to provide you with legal representation so that we can properly conduct your matter.
- b) 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.
- c) Where we need to comply with a legal or regulatory obligation.

9. Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Please note that we may process your personal data based on 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 required	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 provide services to you:	All of your personal data which we receive	a)Performance of a contract with you b)The establishment, exercise or defence of legal matters relevant to you
Manage payments, fees and charges. Collect and recover money owed to us.	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to provide feedback	(a) Identity (b) Contact (c) Profile	(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)
Purpose/Activity	Type of data required	Lawful basis for processing including basis of legitimate interest
To administer and protect our	(a) Identity	(a) Necessary for our legitimate

business	(b) Contact (c) Technical	interests (for running our business, provision of administration and to prevent fraud) (b) Necessary to comply with a legal obligation
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10. Marketing

We do not engage in direct marketing.

11. 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, where this is required or permitted by law.

12. Disclosure of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

13. International transfers

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Where we engage an external third party based outside the EEA, we do so on the basis that it is necessary for the establishment, exercise or defence of legal claims.

14. Data Security

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.

15. Data Retention

How long will you use my personal data for?

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.

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.

We keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) usually for six years after they cease being clients but in the case of wills and probate and conveyancing we may keep the information indefinitely.

In some circumstances you can ask us to delete your data: see below for further information.

16. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below for further information.

If you wish to exercise any of these rights, please contact us.

17. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of 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.

Comply with a Legal or Regulatory Obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers [acting as processors] based abroad who provide legal assistance on matters of law in their countries relevant to your case.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based abroad who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances

18. YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of 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.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.