

Privacy statement Issued by Preuveneers LLP

Introduction

This policy covers the collection, processing and other use of personal data under the General Data Protection Act 2018.

Preuveneers LLP is a law firm registered in England under number OC308189 and regulated by the Solicitors Regulation Authority under number 405540. Our registered office is Preuveneers LLP, 103-105 London Road, Mitcham Surrey CR4 2JA.

Please read this Privacy Policy carefully to understand why data is being collected and what we do with that data in our possession.

Type of information collected

The personal information we collect will depend on the nature of the services we are providing and what we are contracted to do for you. Typically, this might include the following:

Contact details (including your name, address, date of birth, 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)

Where necessary to act in your best interests, and for the establishment, exercise, or defence of your legal matter, we may need to process information 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.

Processing your information.

To comply with mandatory legal obligations to which we are subject to under EU or UK law that we process your personal data which is as follows:

- **'Personal data'** means any information relating to an identified natural person, known as the 'data subject'. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Own Client Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and information from identification documents (passport, driving licence, National Insurance Number, email address, telephone number and may include Location Data.
- **Your Contact Data** includes first name, maiden name, last name, username or similar identifier, email address, telephone number (and which related to all personnel ordering or our Services)
- **Location Data** includes property address for the transaction.
- **Financial Data** includes bank account and payment card details.

It is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you. The retainer between you and Preuveneers LLP, which is made up of our terms of business and engagement letter, sets out the terms and the services we will provide.

Other people's information provided by you to us

Commercial Matters:- In the course of providing our legal and other professional services to you on commercial matters, we will hold and use personal information about you, your officers and/or your employees. When you provide personal information to us relating to your officers or employees, you confirm that you are allowed to do so. You should ensure that those individuals understand how their data will be used by us.

Personal & Residential Matters:- In personal matters you may be providing other third party data to us, for example details about 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.

Your information

We will hold and use personal information about you in the following ways:

- 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 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.
- Refer you to another department within our firm about additional legal services which may benefit you.
- 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.

Information we collect about you from others

Information may be passed to us by third parties in the course of providing our legal services. The processing of this information will be necessary for the progression of your legal matter and to enable us to act in your best interests as your legal representative.

As a law firm we have an obligation to make you aware of anything that is relevant to your matter. When we obtain information about you from a third party rather than from you directly, we will notify you of any relevant information within a reasonable period, and provide you with details including the type of data and source it came from. Typically these sources may include:

- The solicitor acting on the other side.
- Financial institutions and banks involved in financing the transaction.
- Other professional services firms (such as accountants and tax specialists).
- Government bodies (such as HM Land Registry for details of your property).
- Public sources where this relates to you or your organisation (for example Companies House/Land Registry).
- Anti Money Laundering outsourcing.

How long we keep your data for

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

- Carry out the legal work
- Establishment or defence of 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).

Typically we will store the information for 7 years from the date of your file being closed and archived.

Who your information will be shared with

Based upon the services you need we may pass your details to selected people or organisations (data processors) to carry out certain activities on our behalf. For example, information you provide may be disclosed to search company, estate agent, who may keep a record of that information. We may pass your information to any third parties where required to do so in the course of providing legal services, or where we are obliged by law. This will include, but is not limited to:

- A court or tribunal where we are acting for you in a dispute or litigation.
- Government bodies (such as HM Land Registry or HM Revenue and Customs for property related work).
- The solicitors acting on the other side of your matter.
- Legal counsel or other experts to obtain advice or assistance on your matter.
- Other professionals and service providers (such as insurance brokers, where you wish to take out an insurance policy as part of a transaction).
- Any disclosures to law enforcement agencies where required by law (in particular the prevention of financial crime and terrorism).
- Our regulators including the SRA, in connection with any ongoing regulatory investigation.
- Our professional indemnity insurer in the event a claim is made against us in order to defend ourselves.
- The bank or building society or other lender providing finance in the transaction.
- External auditors who may carry out independent checks of your file as part of our accreditations.
- When we receive monies on behalf of you it will be paid into a general client account with (Name of the Bank) who are the firm's banker. The general client account will hold pooled amounts for different clients and matters. If our bank requests information about who we hold funds for, we are required to provide that information. In the event of this happening, you agree to us disclosing your details to them.

At the outset of your matter we may not be aware of all the other parties involved as this will depend on the specific nature of the work.

We will not share your information with third parties for marketing purposes nor do we supply or sell your information to any third.

Security of your data

Your data will be held on secure servers within our Case Management system, currently provided by Practicce – Osprey TM with all reasonable technological and operation measures put in place to safeguard it from unauthorised access. Where possible any identifiable information will be encrypted or minimised.

If we have given you a username and password which enables you to access certain parts of your matter on our systems, you are responsible for keeping it confidential. Please do not share it with anyone.

Your Right in connection with Personal Information - access and update your information

You have a right to request a copy of the personal information we hold about you, known as a data subject access request. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first told us, is updated or removed. These requests are free of charge and can be sent to Risk Manager who is Kelly Cirillo/Satbir Sethi of Preuveneers LLP, 103-105 London Road, Mitcham, Surrey CR4 2JA

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.

How you can object to us using your data

You can ask us to limit the way in which we are using your information or object to certain types of processing. We will do our best to comply with your request unless we have to use the information for legitimate business or legal purposes.

Please note that if you want us to restrict or stop processing your data this may impact on our ability to provide our services. Depending on the extent of your request we may be unable to continue acting for you and be forced to immediately cease acting. In these situations you would remain liable for the fees and disbursements incurred to date.

Complaints about the use of your personal data

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated by writing to Kelly Cirillo/Satbir Sethi Risk Manager of Preuveneers LLP, 103-105 London Road, Mitcham, Surrey CR4 2JA.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at www.ico.org.uk or 0303 123 1113.

If you are not our 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 information 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.

Data protection officer

We have appointed a Data Privacy Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Privacy Manager. 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.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.