

Privacy Notice

1. Privacy Notice

Please read the following information carefully. This privacy notice contains information about the information collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who we share this information with, the security mechanisms we have put in place to protect your data and how to contact us in the event you need further information.

2. Who we are and how you can contact us

Clyde Solicitors is a limited company with a registered companies house no: 09964837, authorised and regulated by the Solicitors Regulation Authority under SRA number 629025.

We at Clyde Solicitors collect, store and process your data. We have our own dedicated “data controller” for the purposes of GDPR and Data Protection Act 2018. Our data Protect officer is Saad Balouch who can be contacted by email – saad@clydesolicitors.co.uk

3. What kinds of personal data we use

We use two types of personal information that you provide to us.

- Personal Data – this is the information that you provide about yourself such as your name, address, gender, date of birth, contact details, financial information etc.
- Sensitive personal data – This information by virtue is much more sensitive that we hold. This includes religious affiliation, race, sexual orientation, political opinions, health data, trade union membership, biometric and generic date.

4. Where did we get your personal data from?

In relation to your information, you may provide this data voluntarily to us. There are other ways in which we may obtain your data:

- Online Services – When you use our online services we may collect your personal data when you subscribe or submit application forms. Your IP details may be stored on our servers.
- Careers and recruitment – We may obtain your data if you are applying for a job with us and provide your education, address, email information. We may also need to carry out Criminal Background checks and will require data from you.
- CCTV – We require CCTV surveillance in our offices to protect our office and our clients. You may be recorded when you visit. We utilise CCTV to ensure safety and security.
- From yourself – We get this information from yourself, or your organisations, or persons associated with you or your affairs. If you are our client, communicating with

5. What do we use your personal data for?

The key reason why we obtain information from you is so that we can carry out your instructions in relation to your legal matters. There are numerous examples as to how we may use your information:

- Maintaining effective financial account recordings.
- Seeking advice from third parties such as third parties, medical agencies, barristers etc.
- We may use your information to adhere to legal and regulatory obligations such as the SRA or Counter Fraud departments for FCA. In some cases, we may be bound by law to do so.
- We may need to reach your data against other data we hold to avoid conflict of interest as this is necessary for complying with our legal obligations under common law and the SRA code of conduct for solicitors.
- We may use your information to notify relevant authorities if we feel there is an element of money laundering or terrorism financing activities. We have a legitimate interest in doing this and, where they apply, this is necessary for complying with our legal obligations under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.
- In order to comply with our legal obligations under The Companies Act 2006 and the SRA code of conduct for solicitors we will keep proper business records.

Privacy Notice

- We may have to deal with your data with other relevant agencies such as SRA, ICO LEGAL OMBUDSMAN, FCA and other legal agencies in relation to matters of complaint files by you.
- We may notify our legal indemnity insurance providers of your data if they have a legitimate interest in it.
- Incepting or instructing insurance policies on your behalf.

6. Who we share the personal data with

Generally, we will only use your information within Clyde Solicitors. However, there may be circumstances, in carrying out your legal work, where we may need to disclose some information to various sources; for example:

- HM Land Registry to register a property
- HM Revenue & Customs; e.g. for Stamp Duty Liability
- Court or Tribunal – HMCTS
- Probation Services
- HM Prisons
- Solicitors acting on the other side
- Asking an independent Barrister or Counsel for advice; or to represent you
- Non-legal experts to obtain advice or assistance
- Translation Agencies
- Contracted Suppliers
- External auditors or our Regulator; e.g. Lexcel, SRA, ICO etc.
- Bank or Building Society; or other financial institutions
- Insurance Companies
- Providers of identity verification
- Any disclosure required by law or regulation; such as the prevention of financial crime and terrorism
- If there is an emergency and we think you or others are at risk
- Crown Prosecution Service
- Police
- Medical Agencies

Furthermore, our duty is to keep information about you and your affairs confidential, as set by law (including the SRA's code of conduct for solicitors). In summary, we have to keep it confidential unless: (i) we need to disclose it in the course of providing our service to you; (ii) you have given us permission to disclose it to a particular person; or (iii) the law or a rule or order of the court requires us to disclose it."

7. Your rights in relation to the personal data we hold about you

Under GDPR, you are entitled to access your personal data (otherwise known as a 'right to access'). If you wish to make a request, please do so in writing addressed to our Data Protection Officer Mr Saad Balouch; or contact the person dealing with your matter.

A request for access to your personal data means you are entitled to a copy of the data we hold on you – such as your name, address, contact details, date of birth, information regarding your health etc. - but it does not mean you are entitled to the documents that contain this data.

Under certain circumstances, in addition to the entitlement to 'access your data', you have the following rights:

Privacy Notice

1. The right to be informed: which is fulfilled by way of this privacy notice and our transparent explanation as to how we use your personal data
2. The right to rectification: you are entitled to have personal data rectified if it is inaccurate or incomplete
3. The right to erasure / 'right to be forgotten': you have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing. This right only applies in the following specific circumstances:
 - Where the personal data is no longer necessary in regards to the purpose for which it was originally collected
 - If you withdraw your consent for us to hold your data or your personal data was obtained or processed unlawfully
 - Where you object to the processing and there is no overriding legitimate interest for continuing the processing
4. The right to object: you have the right to object to processing based on legitimate interests; and direct marketing. This right only applies in the following circumstances:
 - An objection to stop processing personal data for direct marketing purposes is absolute – there are no exemptions or grounds to refuse – we must stop processing in this context
 - You must have an objection on grounds relating to your particular situation
 - We must stop processing your personal data unless:
 - We can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms; or
 - The processing is for the establishment, exercise or defence of legal claims.
5. The right to restrict processing: you have the right to request the restriction or suppression of your data. This means that you can decide which information you would like to disclose to another source. This right only applies in the following circumstances:
 - Where you are in dispute with the accuracy or reliability of your data
 - Where you feel you have a strong ground to object to the processing of a specific piece of data.
 - Where information is illegitimate to process.

8. How long the personal data is kept for

We will only keep your information on computer filed and sometimes on manual files only for as long as necessary to fulfil the purpose for which the information was collected, or as required by law.

We will keep your data for a minimum of 5 years from the conclusion or closure of your legal work.

9. Marketing data

We may contact you for the purpose of direct marketing. This means that we may use your personal data that we have collected in accordance with this privacy policy to contact you about our products or services, events etc. which we feel may interest you. The direct marketing communications may be provided to you by social media channels, email or post. Please note that we will not provide or send or sell your personal information to third parties.

10. What cookies are used on the website

We use cookies and similar technologies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the website and also allows us to personalise and improve the website.

A cookie is a small file of letters and numbers that we put on your device. We use the following kinds of cookie:

Privacy Notice

- **Strictly necessary cookies.** These are cookies that are essential for the operation of the website. They include, for example, cookies that enable you to log into secure areas of the website.
- **Analytical/performance cookies.** These cookies allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. They also allow us to tell if you have reached our website from one of our advertising partners so that we can meet our contractual commitments to that partner.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

11. In relation to third party links

On our website we may post information on our social media accounts such as Twitter and Facebook. These may sometimes include third party links. Clyde Solicitors is not in control of these links and if you leave our page and enter into their page then we have no control over this and we are not liable or responsible for the way in which they process your information. We would advise you to read the privacy policy of every website that you visit and for apps.

12. International transfer

We will never distribute or disclose any of your personal information outside of the EEA (European Economic Activity Zone). We will always take your express consent before releasing your personal information to other sources. We must inform you that we do not have control over the routes emails take, and even emails exchanged between two people in the UK could appear on equipment in countries outside the EU, where they may not be protected by strong privacy or data protection laws.

13. Data Security

We have 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. Our matter files are backed-up to a secure encrypted central server. We take reasonable precautions to reduce the risk of hackers gaining access to our computers. For example, we use anti-virus and firewall software.

We have adopted a high threshold when it comes to confidentiality obligations and both internal and external parties have agreed to protect confidentiality of all information; to ensure all personal data is handled and processed in line with our stringent confidentiality and data protection policies. We have authorised only authorised personnel to deal with your data and all staff are adequately trained to deal with your data.

14. Who you can complain to if you are unhappy about the use of your personal information

If you have any worries or any complaints against us in the way we have handled your information, and then please contact the Data Protection Officer who will investigate your matter. Our Data Protection Officer is Saad Balouch and you can contact him on saad@clydesolicitors.co.uk