

COX & HODGETTS

SOLICITORS

solicitors@coxhodgetts.uk T : 01386 442513

Privacy Notice

1. Applicability

This notice applies to all clients, prospective clients and business contacts about whom we hold personal information.

References to we, our or us in this notice are to Cox & Hodgetts, Solicitors, De Montfort House, 115 High Street, Evesham, Worcestershire, WR11 4HS. We are a firm of solicitors established in England and Wales and authorised and regulated by the Solicitors Regulation Authority – Solicitors Regulation Authority number 70314.

We are a “Data Controller” for the purposes of the Data Protection Legislation. This means we are responsible for deciding how we hold and use personal information about you. We are required under the Data Protection Legislation to make available to you the information contained in this notice. We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your relationship with us. This notice also explains how we comply with the law on data protection and what your rights are for the purposes of data protection.

We may update this notice at any time.

Our contact details are set out in the “Contact us” paragraph at the end of this notice.

2. Personal information collected

We may collect the following types of personal information about you:

- Contact details: information that allows us to identify and contact you directly such as your name, address, email address and telephone number.
- Identification information: passport and other official identification details, information from a third party, anti money laundering (AML) check provider and Companies House information.
- Details of your work history: this may include positions, roles and responsibilities.
- Personal history information: such as hobbies, interests, marital status and family details.
- Creditworthiness: we may undertake investigations into your creditworthiness in order to establish whether to enter into or continue a business relationship with you.

3. Sources of personal information

We will collect personal information from a number of sources, including :-

- Directly from you when you provide AML information, complete forms and documents that we send you and when you contact us by letter, phone, email or communicate with us directly in some other way.
- From third parties such as credit reference agencies, AML check providers, Companies House, LinkedIn and other web platforms and your employer or the organisation you work for.

4. Use of personal information.

In the table below we describe the main purposes for which we collect store and use your personal information and our lawful basis for being able to do this.

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Purpose

Identity and AML checks

Passing details of our AML checks to third parties

Enter into and perform contracts

Deal with your queries or complaints

Maintain and improve services and products

Security of our IT systems

Staff training

Perform credit checks

Determine services that may be of interest to you

To provide you with requested information
Fraud, crime prevention and debt collection

Lawful Basis

We may have a legal obligation to undertake identification and AML checks.
We also have a legitimate interest in knowing your identity.

The third parties have a legitimate interest in undertaking identity and AML checks.

To enter into and perform contracts with either you or the organisation that you represent.

This may be necessary to perform a contract with you or the organisation that you represent.
We have a legitimate interest to improve the services or products we provide.

We have a legitimate interest to improve the services and products we provide.

We have a legitimate interest in ensuring the security of our IT systems.

We have a legitimate interest to improve the services we provide.

We have a legitimate interest to ensure that we are likely to be paid for our services or products.

We have a legitimate interest to improve the services and products we provide.

To comply with the request made by you
We have a legitimate interest to detect and prevent crime and to collect debts

There may be a legal, contractual or other obligation/requirement for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to perform our contract with you or the organisation you represent or to comply with legal obligations and we may have to terminate our relationship with you. There may be types of personal information that you may not be under an obligation to provide to us but if you do not provide it then this may compromise the proper performance of our arrangements with you or the organisation you represent.

5. Third parties with whom we may share your personal information.

Privacy is important to us so we would not sell or rent your personal information to a third party. We will however share your personal information and other data with the following third parties:-

- **Service providers and advisors:** such as companies that provide us with legal or financial advice, support our IT, help us analyse the data we hold, process payments, send communications to our clients, and generally help us to deliver our products and services to you or the organisation you represent.
- **The Government,** relevant regulators and our professional body: where we are required to do so by law or in order to comply with the rules of regulatory bodies and our professional body.
- **Police, law enforcement agencies and security services:** to assist with the investigation and prevention of crime and the protection of national security.
- **Other parties: such as:-**
 - parties involved in a property transaction and if applicable to all other parties in the chain of transactions, their agents and advisors. We are accredited as part of the Law Society Conveyancing Scheme. The scheme is designed to improve transparency of transactions, raise levels of service and provide better communication and a more efficient process. To achieve this we will share information with others involved in the transaction and any related chain of transactions.
 - insurance companies: for example where required during the course of your conveyancing transaction if such information is required to request a defective title or similar insurance be put in place to assist in realising your objectives.
 - HMRC, HM Land Registry, investment advisors (authorised and regulated by the Financial Conduct Authority); Counsel; Costs Draftsmen; Process Servers; Enforcement Agents; Experts and other solicitors or agents when required in order for us to carry out your instructions.

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If we merge with or are taken over by another business your personal information may be shared with the new business owners.

We do not disclose personal information except as set out above.

6. International data transfer

We do not transfer any personal data outside of the European Economic Area. Should this requirement change then we will contact you again to obtain your consent to the transfer.

7. Retaining your personal information.

We will keep your personal information for as long as is necessary for the purpose for which it has been obtained. We will retain the personal information during the period that we are performing our contract with you and for a period of between one and fifteen years thereafter.

It is important to ensure that the personal information we hold about you is accurate and up to date and you should let us know if anything changes, for example if you change your telephone number or email address.

8. Security

We have security measures in place to protect misuse of information under our control. We cannot however guarantee that these measures are or will remain adequate. We do however take data security very seriously and we will use reasonable endeavours to protect the information you provide. Be advised however that the transmission of information over the internet is inherently insecure and we cannot guarantee the security of data sent over the internet.

9. Your rights in respect of your personal information.

You have the following rights in relation to your personal information:

- (i) the right to be informed about how your personal information is being used;
- (ii) the right to access the personal information we hold about you;
- (iii) the right to request rectification of inaccurate personal information we hold about you;
- (iv) the right to request the erasure of your personal information in certain limited circumstances;
- (v) the right to restrict processing of your personal information where certain requirements are met;
- (vi) the right to request that we transfer elements of your personal information either to you or another service provider;
- (vii) the right to object to the processing of your personal information;
- (viii) the right to object to certain automated decision making processes using your personal information.

We would mention however that we do not use automated decision making in relation to your personal information.

10. Website. We do not use any cookies on our website.

11. Contact us.

In the event of any query or complaint in connection with the information we hold about you please email Paul.Spencer@coxhodgetts.uk or write to us:- Paul Spencer, Cox & Hodgetts, De Montfort House, 115 High Street, Evesham, Worcs. WR11 4HS.

12th June 2018