

Privacy Notice

We are committed to protecting and respecting your privacy. This notice applies unless we have notified you of other provisions that apply to specific personal data. It sets out the basis on which we will process any personal data we collect from you, that you provide to us or that we otherwise obtain. Please read this notice carefully. It explains how we will process and protect your personal data and provides information about your rights. By providing your personal data to us you are agreeing to us using your personal data as described in this notice.

1 Definitions

We or us	Vectlaw Ltd (Company Number 12248662), registered office: 38 Knight's End Road, Great Bowden, Market Harborough LE16 7EY Email: admin@vectlaw.com Telephone: +44 20 8064 0719
Our Privacy Manager	Jonathan Leech, Solicitor and Director, Vectlaw Ltd Mobile: +44 7825 171093 Telephone: +44 20 8064 0719 Email: jonathan.leech@vectlaw.com
Personal data	Any data or information, in electronic or hard copy, that identifies you personally or which relates to you when you are identifiable

2 Personal data we process

2.1 We process the following personal data:

- your name and contact details
- identity and other information we require to conduct due diligence on you or an organisation you represent
- personal and financial information relating to legal services we provide to you or an organisation you represent
- personal and financial information relating to legal services we provide to a client in connection with a transaction, dispute or other matter with which you are, or an organisation you represent is, involved as a counterparty, representative, advisor, witness, regulator or in any other relevant capacity

2.2 In our usual course of business we do not intentionally or knowingly process special categories of personal data (being personal data revealing or concerning your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life or sexual orientation).

3 How we obtain your personal data

3.1 We obtain your personal data from:

- you or your representatives

- public records
- other parties you instruct us to contact

3.2 Our clients and contacts may also provide us with information about you if you are involved in a transaction, dispute or other matter with one of our clients or otherwise have a connection with them, such as being an employee or a service provider.

4 How we use your personal data

4.1 We use your personal data in the following ways:

- to identify you
- to provide legal services to you or an organisation you represent
- to perform our obligations under a contract entered into with you or an organisation you represent
- to provide legal services to a client in connection with a matter with which you are, or an organisation you represent is, involved as a counterparty, representative, advisor, witness, regulator or in any other relevant capacity
- to provide you with information you have requested about services we offer
- to make proposals for provision of legal services to you or an organisation you represent
- to notify you about changes to our services
- to deal with any feedback, query or complaint received from you or an organisation you represent
- to consider entry into, perform our obligations or exercise our rights under a contract for procurement of services, goods or works from you or an organisation you represent
- to administer, support, improve and develop our business generally and to enforce our legal rights

5 Our lawful basis for processing your personal data

5.1 The solicitor-client relationship is a contractual relationship. Performance of our client contracts inevitably requires us to collect, process and store personal data relating to:

- our client
- officers, employees and other representatives of our client
- others involved in connection with a matter on which we are engaged

5.2 When we are instructed by you or an organisation you represent we may request information to enable us to identify you or that organisation, to carry out client due diligence and to provide our services. If you do not provide information we request we may not be able to provide our services to you or any such organisation.

5.3 We have the following legitimate interests in processing your personal data:

- entry into and performance of a contract for provision of legal services
- entry into and performance of any other contract with you or an organisation you represent
- considering entry into a contract with you or an organisation you represent
- compliance with our legal and regulatory obligations, including processing identity and other information when conducting due diligence on you or an organisation you represent
- marketing our services to you or an organisation you represent

- sharing information in connection with the law or our services that we think may be of interest to you or an organisation you represent

5.4 We do not anticipate requiring your explicit consent to process your personal data. If that changes we will let you know.

6 Sharing your personal data

6.1 We may need to share your personal data with:

- third parties who are involved with a matter on which we are instructed
- providers of services that are necessary to progress a matter on which we are instructed
- providers of services we use to perform client due diligence checks
- consultants we engage in connection with the provision of our services
- other professionals we instruct on your behalf or on behalf of an organisation that you represent
- people who you ask us to share your personal data with
- our regulators and insurers
- law enforcement agencies
- external auditors that we may appoint to review our files for training, compliance and quality purposes

6.2 Where we share your personal data with third parties, we will ensure that they have appropriate data protection arrangements in place.

7 Where your personal data is held

7.1 We will hold your personal data:

- at our offices and on our IT equipment
- at data centres operated by third party IT service providers

7.2 Where we share your information with a third party, your information will be held at their offices and on their IT equipment or at data centres operated by third party IT service providers.

8 Transferring your personal data outside of the EEA

8.1 We do not have offices outside England & Wales and so have no reason to transfer your personal data outside the European Economic Area unless you or a third party with whom we must share your personal data are based outside the EEA.

8.2 Where we use third party IT service providers (such as cloud based software providers) we ensure that their data centres are either within the EEA or that there are lawful safeguards in place to protect your personal data to the same standard as if it were held within the EEA.

9 Retention of your personal data

9.1 We are required by our insurers and regulators to keep files and personal data for minimum periods. We are not however permitted to keep your personal data indefinitely or for longer than is necessary.

- 9.2 Under our retention policy the minimum period we will keep files and other personal data relating to a legal matter is six years. We may keep file and data for significantly longer than six years if necessary and in our legitimate interests to do so.
- 9.3 When files and other documents containing personal data are no longer required to be retained in accordance with our retention policy those files and documents are destroyed securely.

10 Privacy Manager and Data Controller

- 10.1 We do not have a Data Protection Officer (DPO) but have appointed our Privacy Manager to implement our data protection policies and procedures. Our Privacy Manager's contact details are set out in paragraph 1 above.
- 10.2 For the purpose of Data Protection legislation, the data controller is Vectlaw Ltd.

11 Your rights

- 11.1 You have the right, free of charge, to:
- access and request a copy of your personal data (known as a subject access request)
 - require us to rectify mistakes in your personal data
 - require us to erase your personal data or restrict the way we process your personal data (subject to certain conditions)
 - transfer your personal data to another provider
 - object to us using your personal data for direct marketing
 - require that your personal data is not subject to automated processing (often referred to as 'profiling')
- 11.2 To exercise any of the above rights please contact our Privacy Manager using the contact details in paragraph 1 above or by post at our registered office address. In the case of marketing, there is an 'unsubscribe' button in our marketing emails.
- 11.3 For more information on your legal rights see the Information Commissioner's website (www.ico.org.uk).

12 Complaints and questions

- 12.1 If you have a complaint or question about our use of your personal data, in the first instance please contact our Privacy Manager.
- 12.2 You may also make complaints direct to the Information Commissioner's Office (www.ico.org.uk/concerns, tel: 0303 123 1113).