



## Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

This privacy policy does not apply to any third party websites that may have links to our own website.

Clients of this firm should read this policy alongside our general terms and conditions, which provide further information on confidentiality.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the General Data Protection Regulation (UK GDPR).

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	DPM Legal Services Limited trading as DPM Legal
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

### Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of advising and/or acting for you.

Personal data we will collect	Personal data we may collect depending on why you have instructed us
<p>Your name, address and telephone number.</p> <p>Information to enable us to check and verify your identity, e.g. your date of birth or passport details.</p> <p>Electronic contact details, e.g. your email address and mobile phone number.</p> <p>Information relating to the matter in which you are seeking our advice or representation.</p>	<p>Your National Insurance and tax details.</p> <p>Your bank and/or building society details.</p> <p>Details of your professional online presence, e.g. LinkedIn profile.</p> <p>Details of your spouse/partner and dependants or other family members,</p>

<b>Personal data we will collect</b>	<b>Personal data we may collect depending on why you have instructed us</b>
<p>Information to enable us to undertake a credit or other financial checks on you.</p> <p>Your financial details so far as relevant to your instructions, e.g. the source of your funds if you are instructing on a purchase transaction.</p> <p>Information about your use of our IT, communication and other systems, and other monitoring information, e.g. if using any online client portal.</p>	<p>e.g. if you instruct us on a family matter or a will.</p> <p>Details of your pension arrangements, e.g. if you instruct us on a pension matter or in relation to financial arrangements following breakdown of a relationship.</p> <p>Your employment status and details including salary benefits, e.g. if you instruct us on a divorce matter.</p>

This personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

### **How your personal data is collected**

We collect most of the above information from you. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
  - sanctions screening providers;
  - credit reference agencies;
  - client due diligence providers;
- from a third party with your consent, e.g.:
  - your bank or building society, another financial institution or advisor;
  - consultants and other professionals we may engage in relation to your matter;
  - your employer and/or trade union, professional body or pension administrators;
- via our website—we use cookies on our website (for more information on cookies, please see our cookies policy on our website)
- via our information technology (IT) systems, e.g.:
  - case management, document management and time recording systems;
  - reception logs;

- automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and email.

### How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

<b>What we use your personal data for</b>	<b>Our reasons</b>
To provide legal services to you	For the performance of our contract with you or to take steps at your request before entering into a contract.
Preventing and detecting fraud against you or us	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us.
<p>Conducting checks to identify our clients and verify their identity.</p> <p>Screening for financial and other sanctions or embargoes.</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator.</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- To comply with our legal and regulatory obligations;</li> <li>- For our legitimate interests.</li> </ul>
To enforce legal rights or defend or undertake legal proceedings	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- To comply with our legal and regulatory obligations;</li> </ul>

<b>What we use your personal data for</b>	<b>Our reasons</b>
	<ul style="list-style-type: none"> <li>- For our legitimate interests, i.e. to protect our business, interests and rights.</li> </ul>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	To comply with our legal and regulatory obligations.
Ensuring internal business policies are adhered to, e.g. policies covering security and internet use.	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you.
Operational reasons, such as improving efficiency, training and quality control.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Ensuring the confidentiality of commercially sensitive information.	Depending on the circumstances: <ul style="list-style-type: none"> <li>- For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information;</li> <li>- To comply with our legal and regulatory obligations.</li> </ul>
Statistical analysis to help us manage our practice.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems	Depending on the circumstances: <ul style="list-style-type: none"> <li>- for our legitimate interests, ie to prevent and detect criminal activity that could be damaging for you and/or us</li> <li>- to comply with our legal and regulatory obligations</li> </ul>
Updating and enhancing client records.	Depending on the circumstances:

What we use your personal data for	Our reasons
	<ul style="list-style-type: none"> <li>- to fulfil our contract with you or to take steps at your request before entering into a contract;</li> <li>- for our legitimate interests, eg making sure we can keep in touch with our clients about existing and new services;</li> <li>- to comply with our legal and regulatory obligations;</li> <li>- for our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services.</li> </ul>
Statutory returns.	To comply with our legal and regulatory obligations.
Ensuring safe working practices, staff administration and assessments.	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations;</li> <li>- for our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.</li> </ul>
Marketing our services and those of selected third parties to existing and former clients and third parties	<p>Depending on the circumstances:</p> <p>—for our legitimate interests, ie to promote our business</p> <p>—consent</p>
Credit reference checks and external credit reference agencies.	For our legitimate interests or those of a third party, i.e. for credit control, and to ensure our clients are likely to be able to pay for our services.
External audits and quality checks, e.g. for CQS, ISO or Investors in People accreditation and the audit of our accounts.	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- for our legitimate interests, ie to maintain our accreditations so we</li> </ul>

What we use your personal data for	Our reasons
	<p>can demonstrate we operate at the highest standards;</p> <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations.</li> </ul>
<p>To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale or in the event of our insolvency.</p> <p>In such cases information will be anonymised where possible and only shared where necessary.</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations;</li> <li>- in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets.</li> </ul>

Where we process special category personal data (see above 'Key terms'), we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent;
- the processing is necessary to establish, exercise or defend legal claims; or
- the processing is necessary for reasons of substantial public interest.

### Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal data for promotional purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us by calling us on 01483 521597
- email us on [enquiries@dpmlegal.co.uk](mailto:enquiries@dpmlegal.co.uk)

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

### **Who we share your personal data with**

We routinely share personal data with:

- professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors or other experts;
- other third parties where necessary to carry out your instructions, e.g. your mortgage provider or HM Land Registry in the case of a property transaction or Companies House;
- companies providing services for money laundering checks and other crime prevention purposes and companies providing similar services, including financial institutions and credit reference agencies;
- our group companies;
- credit reference agencies;
- our insurers and brokers;
- external auditors, e.g. in relation to ISO, CQS or Lexcel accreditation and the audit of our accounts;
- our bank;
- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. providers of our case management system and finance system, data storage platforms, typing services, marketing agencies, document collation or analysis suppliers.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisers (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised but this may not always be



possible and the recipient of any of your personal data will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

### **Where your personal data is held**

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see '**Who we share your personal data with**').

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the UK**'.

### **How long your personal data will be kept**

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;

to keep records required by law

As a general rule, we will keep your personal data for at least twelve years from the conclusion of your matter, in case you, or we, need to bring or defend any complaints or claims. However, different retention periods apply for different types of personal data and for different services, e.g.:

- we will need to keep information relating to a trust for the duration of that trust and for a minimum of seven years thereafter;
- in probate matters where there is a surviving spouse or civil partner, personal data may be retained until the survivor has died, to deal with the transferable inheritance tax allowance;
- wills and related documents may be kept indefinitely;
- deeds related to unregistered property may be kept indefinitely as they evidence ownership;
- where the matter involves a child, we will keep information for a reasonable period after the child turns 18.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

## Transferring your personal data out of the UK

It is sometimes necessary for us to transfer your personal data to countries outside the UK. This may include countries which do not provide the same level of protection of personal data as the UK.

We will transfer your personal data outside the UK only where:

- the UK government has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy decision); or
- there are appropriate safeguards in place (eg standard contractual data protection clauses published or approved by the relevant data protection regulator), together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under data protection law.

You can contact us (see '**How to contact us**' below) if you would like a list of countries benefiting from a UK or European adequacy decision or for any other information about protection of personal data when it is transferred abroad.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to restrict processing of your personal data—in certain situations, eg if you contest the accuracy of the data
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal data being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests, unless there are compelling legitimate

	grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
The right to withdraw consent	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time.</p> <p>You may withdraw consents by writing to us.</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.</p>

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: ‘**How to contact us**’; and
- let us have enough information to identify you (*eg your full name, address and client or matter reference number*);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator). Please contact us if you would like further information.

## Changes to this privacy policy

This privacy policy was last updated in March 2023.

We may change this privacy policy from time to time. When we do, we will publish the updated version on our website.

## Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, eg your surname or address—see below '**How to contact us**'.

## How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

<b>Our contact details</b>
DPM Legal Services Limited Sutton House Weyside Park Catteshall Lane Godalming Surrey GU7 1XE  01483 521597  <a href="mailto:enquiries@dpmlegal.co.uk">enquiries@dpmlegal.co.uk</a>