

ROBYNS OWEN

DATA PROTECTION POLICY

We are committed to protecting your personal data and respecting your privacy. This policy sets out how we will process any personal data which we collect from you or which you provide to us.

This policy may be updated from time to time and our latest policy can be found on our website or you may request a copy from us.

1. INTRODUCTION

The data controller responsible for your personal data is Robyns Owen Solicitors of 36 High Street, Pwllheli, Gwynedd LL53 5RY and of 14 New Street, Porthmadog, Gwynedd LL49 9ED (ICO registration no's: Z9661154-Pwllheli office and Z6167719-Porthmadog office).

2. THE DATA WE COLLECT AND HOW IT IS COLLECTED

We may collect and process the following data:-

- Personal and identity data including your name, title, postal address, date of birth, national insurance number, e-mail address, telephone numbers, qualifications, information about your family, photographic identification such as copies of your passport and driving licence and other ID;
- Financial data including your bank account and payment card details;
- Other data that you provide us in connection with the legal services and advice which we provide to you including financial affairs, employment history, family details, income and tax affairs, medical information, business affairs and property ownership.

You may withhold your data from us, but if we are required to collect personal data by law or to provide legal services to you and you fail to provide such data, then we may not be able to continue providing our services to you.

Your data may be collected by us through various means, including:-

- Directly from you when you communicate with us in person, by correspondence, telephone or e-mail;
- From professionals and others providing you with services e.g. your accountant, mortgage broker, financial advisor or bank;
- From members of your family where we communicate with them directly;
- From other clients who you jointly instruct with us;
- From online agencies for the purposes of verifying your identity;
- From public records e.g Land Registry and Companies House.

3. HOW WILL WE USE YOUR PERSONAL DATA

We will only use your personal data when we are permitted by law.

Your personal data may be used by us for the following purposes:-

- To register you as a new client;

- To provide legal services to you and to carry out your instructions in the provision of our legal services;
- To carry out conflict of interests, identity and anti-money laundering checks;
- To share information with other professional advisors providing services to you;
- To deal with any query that you raise with us in the provision of our legal services including historical services provided to you;
- To manage our relationship with you including for administration and accounting purposes;
- To enable you to complete a survey as regards the provision of our legal services to you;
- To protect our business and our website including troubleshooting, data analysis, testing, system maintenance, support and hosting of data;
- To comply with our professional, legal and regulatory obligations.

The legal bases we will rely upon for processing your personal data are:-

- Performance of a contract with you;
- Compliance with a legal obligation;
- Necessary for our legitimate interests. These legitimate interests will include to manage our relationship with clients, to maintain compliance with policies and procedures and to manage our business.

We will only use your personal data for the purpose for which it was collected. If we are required to or are permitted by law to do so, then we may process your personal data without your knowledge or consent.

As we are required by law and our regulators to undertake checks on the identity of our clients, we may pass your details to third party search providers in order to carry out these checks.

4. SHARING YOUR PERSONAL DATA

It may be necessary for us to share your personal data with third parties for the purposes set out above. These third parties are:-

- Your other professional advisors including barristers, accountants, mortgage brokers, financial advisors, banking institutions and insurers;
- Our professional advisors including other solicitors, banking institutions, accountants, auditors and insurers;
- Search providers who carry out checks on your identity;
- Third parties and organisations which we use in providing legal services including other solicitors, the Land Registry, courts, banking institutions, lenders, HMRC, the Probate Registry, surveyors, estate agents, medical experts and expert witnesses;
- Regulators and authorities including the Law Society, the Solicitors Regulation Authority, HMRC and crime prevention agencies;
- Our service providers who provide IT, system administration and business support services.

5. RETENTION OF YOUR PERSONAL DATA

We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected by us, including for the purposes of complying with any legal, reporting or accounting requirements.

In determining the appropriate retention period, we will have regard to the nature, quantity and sensitivity of the personal data, the purposes for which your personal data is processed and whether those purposes can be achieved by other alternative means, the potential risk of harm from unauthorised use of your personal data and the legal requirements applicable at any given time.

6. YOUR RIGHTS

You have rights as regards your personal data as follows:-

- To be informed what personal data we hold, the purposes for processing your personal data and details of any third party with whom your personal data has been shared;
- To request access to your personal data;
- To request correction of your personal data if we hold inaccurate or incomplete information;
- To request erasure of your personal details in certain circumstances including where there is no good reason for us continuing to process it and where we may have processed your personal data unlawfully;
- To object to the processing of your personal data in specific circumstances including where we are relying on a legitimate interest;
- To restrict the processing of your personal data in certain circumstances including where you are contesting the accuracy of the personal data which we hold and we are verifying the accuracy of such data;
- To data portability i.e to request the transmission of your personal data to a third party.

If you wish to exercise any of your rights, please contact us by either post at 36 High Street, Pwllheli, Gwynedd, LL53 5RY, telephone 01758 613177 or e-mail robynsowen@f2s.com. You will not be required to pay a fee to access your personal data or to exercise any of your other rights but we may charge you a reasonable fee if your request is unfounded, repetitive or excessive.

You also have the right to complain to the Information Commissioner's Office (ICO) (www.ico.org.uk).