

## **Hierons LLP Privacy Statement**

### **Introduction**

Welcome to the Hierons LLP privacy statement.

Hierons LLP respects your privacy and is committed to protecting your personal data. This privacy statement explains how we collect and look after your personal data and tells you about your rights and options with regard to your personal data. If you would like information concerning our client confidentiality obligations please refer to our terms of engagement. You may also want to look at our Cookie Policy which explains the use of cookies and other web tracking devices via our website, this can be found at [www.hieronslaw.com](http://www.hieronslaw.com).

This privacy statement is provided in a layered format so you can click through to the specific areas set out below.

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## 1. Who we are and contact details

Hierons LLP (“**Hierons**”), is a limited liability partnership registered in England and Wales with number OC 367004 with its registered office at 2 Chester Row, London, SW1W 9JH, and is authorised and regulated by the Solicitors Regulation Authority [www.sra.org.uk](http://www.sra.org.uk), SRA no. 563070.

### *Controller*

Hierons LLP is the controller and responsible for your personal data ("we", "us" or "our" in this privacy statement).

### *Contact details*

If you would like to contact us with any questions regarding this Privacy Statement or your rights in relation to personal data please send an email to [info@hieronslaw.com](mailto:info@hieronslaw.com) or telephone 020 3328 4510 or write to the Office Manager at Hierons LLP, 2 Chester Row, London, SW1W 9JH, England.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender and job title.
- **Contact Data** includes your business address, your home address (if you have given it to us) email address, fax number, business telephone numbers and personal mobile telephone number (if you have given this to us).
- **Payment and Financial Data** such as data necessary for processing payments and fraud prevention, including bank account and payment card details, security code numbers and other related billing information, information from credit agencies.
- **Other Client Data** such as information that is necessarily collected and processed as part of a project or client relationship with Hierons or which you have voluntarily provided to us as part of client instructions; and any other information which is required or useful to enable us to provide you with the advice that you are seeking from us.
- **Information required to meet legal and regulatory requirements**, in particular in respect of anti-money laundering legislation, including information on source of funds and wealth.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

- **Job Application Data** includes your name, email address, address, contact telephone number, your CV, work history, educational details, references, interview notes, passport information, HM Revenue & Customs and National Insurance numbers and other associated information, visa, immigration status and travel information (if relevant for recruitment purposes), results of DBS checks and the role for which you are applying.

We do not generally collect any **Special Categories of Personal Data** about you (but if we do we will only do so with your consent) - this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, CCTV footage or information concerning food allergies and access information in respect of visitors to our offices. We do not collect any information about criminal convictions and offences except to the extent required for compliance or recruitment purposes and to the extent permitted by applicable laws.

### **Do you have to provide personal data**

In some circumstances if you choose not to provide personal data to us or not to provide consent to use your personal data (where your consent is required) we may not be able to provide you with some or all of our services, for example if the personal data is necessary to process your instructions, take payment, provide access to our website or to receive newsletters or other communications or to carry out legally required compliance screening. In these cases, we will inform you if we cannot provide you with our services.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you, including:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when:
  - you or your organisation seek legal advice from us;
  - you or your organisation browse, make an enquiry or interact in other ways with our website;
  - you or your organisation subscribe to our service or publications;
  - you or your organisation request marketing to be sent to you;
  - you or your organisation offer to provide services to us;
  - you or your organisation give us comments or feedback; or
  - if you are a job applicant when you apply for a job and provide personal data as part of the pre-application and application process.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources in the context of provision of legal services or in the wider context of our business.
- Identity and Contact Data collected from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 4. Purposes for which we may use your personal data

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances (“Permitted Purposes”):

- To provide legal advice or other services that you or your organisation has requested.
- Managing and administering your or your organisation’s relationship with Hierons including processing payments, accounting, auditing, billing and collection and support services; and analysing and improving our services and communications to you.
- Where we need to perform a contract we are about to enter into or have entered into with you.
- Compliance with our legal obligations including record-keeping, compliance screening or recording obligations (e.g. for anti money-laundering, export laws, trade sanction and embargo laws, financial and credit checking, fraud and crime prevention and detection purposes); and complying with legal and regulatory requests from national and international regulatory bodies.
- Protecting the security of our premises, IT and communications systems, websites and other systems.
- Monitoring and determining compliance with our policies and standards.
- For insurance purposes.
- Compliance with court orders and establishing, exercising and defending legal claims.
- If you are a job applicant, for the purpose of processing your job application that you submit to us, directly or via an agent or recruiter (speculatively or in response to any advertisement).
- For any other purpose connected with any of the above purposes, and for any other purpose for which you have provided your personal data.
- If we have provided services to you or you have requested information about Hierons or our services we may from time to time send you business or marketing communications (such as legal updates or news about Hierons) that we think may be of interest to you, unless you have opted out of receiving such communications. You can opt out of receiving such communications at any time by following the opt-out or unsubscribe links on any marketing communication sent to you.

#### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact [info@hieronslaw.com](mailto:info@hieronslaw.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become

inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy at [www.hieronslaw.com](http://www.hieronslaw.com).

## **5. Lawful bases on which we will use your personal data**

In most cases the lawful basis for which we hold and process your personal data is on the basis of our legitimate interests as a business that provides legal advice and services or on the basis of the legitimate interests of a third party recipient of your personal data, where such interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal data.

In some cases the lawful basis for which we hold and process your personal data will be:

- if you have given your express consent for the processing of your personal data, processing that personal data for the purpose for which you gave your consent which you can withdraw at any time as explained in Section 10 (“Your legal rights”) below; or
- if processing is necessary for us to perform any contract with you; or
- if processing is necessary to comply with our legal obligations (e.g. to keep records for tax or regulatory purposes).

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. Disclosures of your personal data**

We may have to share your personal data with other parties in certain circumstances.

- If you are a client of Hierons or are an employee, contractor or agent of a client of Hierons, we may share your personal data on a confidential basis with third parties where disclosure is required for the purpose of providing legal advice or other services to you or your client, including barristers, other legal specialists (including mediators), accountants, overseas law firms (for the purpose of obtaining overseas legal advice) and other consultants and experts engaged by us, you or our client or engaged by other third parties in relation to the same matter on which we are providing legal advice or other services to you or our client.
- If we have collected your personal data during the course of providing legal advice or other services to any of our clients, we may disclose it to that client, and if permitted by law, to third parties for the purpose of providing that advice and/or those services.
- We may provide your personal data to other organisations that provide credit check and money laundering checking services or for other fraud and crime prevention purposes including financial institutions, credit reference agencies and regulatory bodies.
- We share your personal data with IT companies that support our business systems, with service providers and our professional advisers where it is reasonably necessary to obtain advice or services for the operation of our business; and in these circumstances Hierons will retain control over and will remain responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data.
- We may share your personal data with HM Revenue & Customs, regulators and other authorities based in the United Kingdom to the extent required by law.

- We may share your personal data with third parties who collect feedback on our services from you and from clients for the purpose of measuring, improving and promoting our services.
- We may share your personal data with the police and similar bodies, hospitals and doctors, where this is to prevent a crime, or necessary in the event of a medical emergency or when we are required to do so by law.
- We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal claim or for the purposes of a confidential alternative dispute resolution process.
- We may share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy statement.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. International transfers**

We may transfer your personal data outside of the European Economic Area (“**EEA**”) if required for the Permitted Purposes described above. This might include countries that do not provide the same level of protection as the laws of your home country such as the EEA. Where we do so we will only transfer your personal information to such third parties outside the EEA if:

- a) that third party is situated in a country that has been confirmed by the European Commission to provide adequate protection for personal information; or
- b) that third party has agreed (by way of written contract) to provide all protections to your personal information as required by applicable data protection legislation; or
- c) the transfer is otherwise permitted by law.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **8. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

## 9. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting, or reporting requirements or for as long as it is required for Hierons to assert or defend legal claims; or until you withdraw your consent for its retention (if applicable).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means and the applicable legal requirements.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access to your personal data**
- **Request correction of your personal data**
- **Request erasure of your personal data**
- **Object to processing of your personal data**
- **Request restriction of processing your personal data**
- **Request transfer of your personal data**
- **Right to withdraw consent**

If you wish to exercise any of the rights set out above, please contact us at [info@hieronslaw.com](mailto:info@hieronslaw.com).

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### 11. Status of this Privacy Notice and Changes

This Privacy Notice was updated in May 2018. It is non-contractual and we reserve the right to amend it from time to time to take account of changes in law, including Britain leaving the European Union and changes in our business practices and personal data processing activities. Any updates made to this Notice will appear on our website at [www.hieronslaw.com](http://www.hieronslaw.com).

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