

## VETA LAW PRIVACY NOTICE

Veta Law provides legal services to our clients in accordance with their instructions. Veta Law is committed to protecting the privacy and security of the personal information provided to us.

This privacy notice describes how we collect and use personal information provided to us in accordance with the General Data Protection Regulation (GDPR) through the use of this website and otherwise. It applies to all clients, prospective clients, former clients and contacts of Veta Law.

Veta Law is a "data controller". This means that Veta Law ("we") are responsible for deciding how we hold and use personal information supplied to us. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this notice at any time.

We are registered with the Information Commissioner's Office, registration number ZA295076.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### Data protection principles

We aim to comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### The kind of information we hold

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).

There are "special categories" of more sensitive personal data which require a higher level of protection.

### Where you are a client:

To enable us to provide our client with the legal services we have agreed to provide, we may need to collect, store, and use the following categories of personal information about you:

- Information to verify your identity, such as name, title, gender, copy of driving licence, passport, utility bills.
- Contact data such as billing address, home address, telephone numbers, and work and personal email addresses.
- Financial data including bank account details, national insurance number, HMRC records personal to you.

- Marketing and communications data including your preferences in receiving marketing from us and your communication preferences.
- Other data provided to us by you during the course of our contractual relationship relevant to the provision of legal advice, including personal information about you or others involved in the matter.
- Legal documents, such as Wills and Property Title documents.

We may need to collect, store and use the following "special categories" of more sensitive personal information where it is necessary for the legal services we are providing to you or the enquiries you are making:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health or the health of a family member, including any medical condition, health and sickness records.
- Information about any relevant criminal convictions and offences.

**Where you are a prospective client enquiring about our services:**

We collect information contained in any enquiry you submit to us regarding our services ("enquiry data") which may include your name, email address, telephone number and any further details you provide to us to support your enquiry. The enquiry data may be processed for the purpose of contacting you by phone or by the email address you provide in order to discuss the legal services we offer.

**Where you apply for a job with us:**

If you submit job application data through our website or via email, the application data may be processed for the purposes of recruitment only. These details may be held for future possible vacancies. If you provide your application data and wish to have it deleted, please contact [laurenkillilea@vetalaw.com](mailto:laurenkillilea@vetalaw.com)

**How is your personal information collected?**

We collect personal information about clients, prospective clients, former clients and contacts of Veta Law directly from the relevant individual or organisation or from a third party relevant to the legal advice, such as a financial advisor or accountant.

**How we will use information about you and for what purpose**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to do so to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests or those of a third party, and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

## Situations in which we will use your personal information

### Where you are a client:

We need all the categories of information in the list above primarily to allow us to **perform our contract** with you and to enable us to comply with **legal obligations**. In some cases, we may use your personal information to **pursue legitimate interests of our own or those of third parties**, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below.

- Fulfilling and administering the contract we have entered into with you for example:
  - Setting you or your organisation up as a client,
  - Taking instructions from you
  - Advising you and managing the matter appropriately
  - Invoicing
- Business management and planning, including accounting and auditing.
- Building a knowledge base of cases and useful documents in order to provide better services to our clients.
- You having access to information about events relevant to you.
- Meeting our compliance requirements which includes keeping anti-money laundering records.
- Achieving and maintaining professional accreditations.
- In order to protect us and third parties against security breaches and fraud.
- Complying with directions from a Court, Tribunal or other judicial or quasi-judicial authority such as an Arbitrator.
- Complying with investigations by statutory regulators e.g. the SRA, Legal Services Ombudsman or Information Commissioner's Office.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you fail to provide personal information:**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations. In certain circumstances this may lead us to considering terminating our client relationship with you.

## **Where you are not a client:**

We may also hold and process your personal data where you are any of the following:

- A prospective client who has made an enquiry about our services through our website or otherwise;
- A party to any matter involving any of our clients, where it is necessary for us to hold and process your personal data;
- A professional referrer such as an IFA or accountant;
- An individual or company that has provided your contact details to us for the purpose of receiving updates, newsletters and information, or have attended or are interested in networking and marketing events and initiatives;
- A provider of services to us.

We will hold and process your personal data for the purposes you would reasonably expect and we rely on one or more the of the following lawful bases to do so:

- The processing being necessary for the purposes of the **legitimate interests of both you and/or our business**, for example in receiving your instructions to act for you on a legal matter, developing our business, providing you with information and events relevant to you, meeting our compliance requirements, achieving and maintaining professional accreditations, protecting us and third parties against security breaches and fraud.
- The processing being **necessary for us to comply with our legal obligations**, for example complying with directions from a Court, Tribunal or other judicial or quasi-judicial authority such as an Arbitrator, complying with investigations by statutory regulators e.g. the SRA, Legal Services Ombudsman or Information Commissioner's Office.

## **Marketing**

We very rarely send clients and contacts marketing information. Where we do, we never send out details to third party marketing organisations. If you want to stop receiving such information you should let us know.

## **Change of purpose**

We will only use your personal information 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 us. If we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information in the course of legitimate business activities with the appropriate safeguards.

### **Our obligations as a professional services provider**

We will use your particularly sensitive personal information in the following ways:

- Where you have provided evidence of disability or physical or mental ill health of yourself or a family member we will use that information with your explicit consent or to carry out legal obligations, for example, to Court.
- To establish, exercise or defend a legal claim.

**Do we need your consent?** We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **Data sharing**

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

If we do, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the contractual relationship with you or where we have another legitimate interest in doing so.

### **Which third-party organisations do we share personal information with?**

We will share your personal data with our accountant and book-keeper for the purposes of auditing our accounts and book-keeping and with external IT service providers who process your data on our behalf in order to provide essential IT functions. We also may need to share your personal data with our professional indemnity insurance company and broker.

### **How secure is my information with third-party service providers and other entities in our group?**

Where appropriate we will also seek assurances from third parties that they adhere to the same strict standards of data protection as we do.

## **When might you share my personal information with other entities in the group?**

We do not currently have any group companies however if we do in future we will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

## **Transferring information outside the EU**

We do not envisage that we will need to transfer your data outside the EU in order to perform our contract with you (unless we are needing to take foreign legal advice on your employment law situation). If we do, we will consider whether there is an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

## **Data security**

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

## **Data retention - How long will you use my information for?**

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements in respect of your contractual arrangement with us.

Where you are a client, we will store your data for at least 7 years after our contract with you comes to an end. We consider this to be the appropriate retention period for your personal data, given the nature of our contract with you, the 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 and whether we can achieve those purposes through other means, and the applicable legal requirements.

After the appropriate retention period we will securely destroy your personal information in accordance with applicable laws and regulations.

## **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Firm's Data Protection Officer in writing.

Please be aware that if you exercise your right to object to or restrict the processing of your data it may not be possible for us to represent you in relation to your employment law matter. All requests received will be assessed on balance taking into account our legitimate interests as a data controller.

### No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Firm's Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Data protection officer**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. Lauren Killilea, Senior Partner, is the DPO. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO on 01625 810 300 or [laurenkillilea@vetalaw.com](mailto:laurenkillilea@vetalaw.com). 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. We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact the DPO, Lauren Killilea, on 01625 810 300 or [laurenkillilea@vetalaw.com](mailto:laurenkillilea@vetalaw.com)**