

## PRIVACY NOTICE

The General Data Protection Regulation (the “**GDPR**”) seeks to protect and enhance the rights of data subjects. Themis Lawyers Ltd (“**Themis Lawyers**”) is committed to protecting and respecting your privacy. Themis Lawyers recognises the importance of the correct and lawful treatment of personal information, and will only use personal information as set out in this Privacy Notice.

This Privacy Notice sets out how Themis Lawyers collects and uses any information that you give us when you use this website. The expressions “**we**”, “**us**” and “**our**” refer to Themis Lawyers.

We have appointed a Privacy Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the Privacy Officer at: [sobia@themislawyers.co.uk](mailto:sobia@themislawyers.co.uk), or by post to: Themis Lawyers Ltd, 394 Barlow Moor Road, Chorlton, M21 8BH.

We may change this Privacy Notice at any time by updating this page so you should therefore check the Website from time to time to ensure you are aware of any changes. It is important that you read this Privacy Notice, together with any Themis Lawyers terms and conditions that 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 personal information. This Privacy Notice supplements the other notices and is not intended to override them.

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.

### **Who are we?**

Themis Lawyers are a firm of solicitors who are a registered company, based in England under company number **08880267**, with its registered office at 394 Barlow Moor Road, Chorlton, M21 8BH.

### **In what capacity will Themis Lawyers hold personal information about you?**

During the course of providing its services, Themis Lawyers compile and hold certain personal information about living individuals for the purposes of dealing with their case. This may include personal information about their road traffic accident, family and divorce issues etc and others with whom we communicate and other third parties.

In providing these services, we will act as both a Data Processor and in some instances, as a Data Controller in respect of your personal information. In the cases where we are not the Data Controller, the Data Controller will be the relevant Lender.

### **How is your personal information collected?**

We use different methods to collect personal information from and about you.

**Directly from you:** Typically the personal information that we collect about you will be the personal information that is input onto the Website. In some instances, however, it could be provided in other electronic formats, on application forms, or in other communications which may be in writing, by telephone, via the internet or by any other means.

**From third parties:** We will also gather personal information from other sources, including from insurance companies, law firms, credit reference agencies and regulatory bodies.

### **What personal information will Themis Lawyers hold about you?**

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 information about you, as follows:

- full name and title
- contact information including email addresses and postal addresses, telephone numbers and fax numbers
- date of birth
- identification or supporting documents (such as passport, driving license, birth certificate, utility bill etc.)
- IP address
- gender
- bank details
- customer data

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership,

### **How will Themis Lawyers use personal information held about you?**

We will only use your personal information when the law allows us to.

We will use your personal data where we need to: (a) in order to meet our contractual obligations under our agreement with you; (b) 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; or (c) where we need to comply with a legal or regulatory obligation. In summary this means we use your

<b>What we use your personal information for</b>	<b>Our reasons (legal basis)</b>	<b>Our explanation of Themis Lawyer's legitimate interests</b>
Set up your file	• Legitimate interest	Process efficiency in dealing with such activity.
Storing payment cards	• Consent	N/A
Process your file	• Fulfilling a contract	N/A
Notify you of your file status.	• Legitimate interests	Process efficiency in dealing with such activity, and to make improvements to our services.
Manage your file/ provide customer services to you.	• Legal obligation/ Legitimate interests	Keeping our records up to date, handling our customer contact

To detect, investigate and report financial crime (e.g. Fraud)	• Legal Obligation / legitimate interests	efficiently and effectively, working out which of our products and services may interest you and telling you about them.
Undertake website personalisation and administration.	• Legitimate interests	Developing and improving how we deal with financial crime. Complying with any legal obligation placed on us by regulators such as the SRA. Complying with any regulations that apply to us. Process efficiency in dealing with such activity, and to make service and process improvements.
Marketing communications to inform you of special offers, promotions, new lines and Sales. Provide you with online advertising.	• Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites. Defining types of customers for new products or services
Notifying you about enhancements to our services, such as changes to the website and new services that may be of interest to you.	• Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites.
Contact you to undertake customer satisfaction surveys,	• Legitimate interests	Developing products, services, applications

invite you to provide product reviews or for market research.

and designs that attract and retain customers. Improving customer interaction with our sites.

Maintaining network and data security

- Legitimate interests

To maintain the security of our network this in turns helps us to maintain the safety and confidentiality of your information.

Logistics planning, demand forecasting, management information and research

- Legitimate interests

We use information about shopping habits, products bought and volumes, to help us to respond to demand, ensure the right products get to the right areas and to help

### **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 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.

### **Disclosure of your personal information**

Themis Lawyers may share the personal information that it has about you with third parties and with any organisation the parties may appoint to carry out the services in the future (collectively, the “**Relevant Parties**”).

Your personal information may also be disclosed to the following parties:

- employees of the Relevant Parties;
- affiliates of the Relevant Parties;
- group companies of the Relevant Parties;
- successors in title to the business of the Relevant Parties;
- providers of IT solutions to the Relevant Parties;
- third party consultants, who may access the personal information when providing services to the Relevant Parties (including but not limited to IT support services);
- government bodies, law enforcement agencies, regulatory bodies, legal societies, trade associations and in response to other legal or regulatory requests from similar third parties;
- legal advisers, auditors, contractors or other advisers auditing, assisting with or advising on any of the business purposes of the Relevant Parties.

If you give us personal information regarding another person, you are confirming they have given you permission to provide their personal information to us to be able to process their personal information and also that you have advised them that their personal information will be passed to Themis Lawyers.

**Will your personal information be transferred to other countries?**

We may need to share personal information with third parties in both the UK and internationally for a variety of reasons. We require third parties to respect the security of your personal information and to treat it in accordance with the law. We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We may transfer the personal information we collect about you to countries outside the EU in order to process your personal information on one of the grounds listed above. It is possible that the European Commission will have deemed such countries adequate. This means we can transfer your personal information to those countries as they will provide an adequate level of protection for your personal information.

However, not all countries to which we may transfer your personal information will be deemed adequate by the European Commission. To ensure that your personal information does receive an adequate level of protection we will put in place standard contractual clauses approved by the European Commission with those third parties wherever necessary. This ensures that your personal information is treated in a way that is consistent with and which respects the applicable laws on data protection.

### **What happens if you choose not to provide us with personal information or are unable to provide us with personal information?**

If you fail to provide certain personal information when requested, we may not be able to perform the agreement we have entered into with you, or we may be prevented from complying with our legal obligations.

If you are unable or not willing to provide personal information this may also impact our ability to progress your case.

### **What are your rights relating to the use of your personal information?**

Under the GDPR, you have certain rights in respect of the processing of your personal information, which may vary dependent on the legal basis for collection of your personal information and the uses made of this personal information.

For all uses made of your personal information you have the right to be informed about how we use your personal information, and this notice discharges that obligation. However, further rights may apply in different circumstances, as set out below:

- Right of access- you have a right to access a copy of the personal information that is held about you (subject to Data Protection Laws).
- Right of rectification- you have a right to correct personal information that is held about you if it is inaccurate or incomplete.
- Right to be forgotten- in certain circumstances you can ask for the personal information held about you to be erased (please note our retention period set out below).
- Right to restrict processing- where certain conditions apply you have a right to restrict processing (please note this may impact our ability to provide our services to you or your law firm).
- Right to data portability- you have the right to have the personal information held about you to be transferred to another organisation, where applicable Themis Lawyers will provide copies of personal information in a structured commonly used, and machine readable form.
- Right to object- you have the right to object to certain types of processing, such as marketing (please note that we will only ever use your contact information for marketing purposes where you have provided express consent).
- 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 [sobia@themislawyers.co.uk](mailto:sobia@themislawyers.co.uk) , or by post to: Privacy Officer, Themis Lawyers, 394 Barlow Moor Road, Chorlton, M21 8BH

In the event you wish to exercise any of these rights, please make your request in writing to Themis Lawyer's Privacy Officer.

### **How long will Themis Lawyers retain your personal information for?**

We will only retain your personal information for the duration of our agreement with you and 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.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we

process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.



In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such personal information without further notice to you.

## **Security**

We have put in place measures to protect the security of your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However the internet is not a secure medium but we are committed to ensuring that your personal information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information we collect online. We will use our best efforts to ensure that no unauthorised parties have access to any of your personal information and we restrict access to non-public information about you to those individuals and entities that need to know the personal information to be able to provide products and services to you.

## **Links to other websites**

The Website may contain links to enable you to visit other websites of interest more easily. However, once you have used these links to leave our Website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and this Privacy Notice does not govern such sites.

## **Further information**

In the event you have any questions about this Privacy Notice or wish to make a complaint about how your personal information is being processed by Themis Lawyers you have the right to complain to the Privacy Officer, by email to: [sobia@themislawyers.co.uk](mailto:sobia@themislawyers.co.uk) , or by post to: Privacy Officer, Themis Lawyers, 394 Barlow Moor Road, Chorlton, M21 8BH

You have the right to make a complaint at any time to the relevant supervisory authority. The UK supervisory authority for data protection issues is the Information Commissioner's Office (ICO).

## **Legal statement about this Privacy Statement**

This Privacy Notice is not designed to form a legally binding contract. It is a guide to the use of the Website.

Use of the Website by you constitutes acceptance by you of the Privacy Notice. If you do not wish to accept the Privacy Notice, you should not continue to use the Website.

**This Privacy Notice was last updated on 8<sup>th</sup> May 2018**