

## PRIVACY NOTICE

This page details how we process the personal data we hold about you and how you can control the retention and use of that data. Personal data only includes information relating to persons who can be identified directly from the information in question. When you begin a business relationship with us, the data you provide may be used for different purposes and be treated in different ways. In light of this, we highlight the ‘journey’ that a Client is engaged in, from initial instructions through to the termination of the retainer, in order that you can understand how your data is used and why. Essentially, we seek only to use and retain such data that is necessary either for the performance of our contract with you (i.e., supplying the service that you have purchased), or where some other lawful purpose is engaged (e.g., holding data for accounting record purposes).

In order to purchase services from Fulchers Solicitors, we ask that you review and accept (consent to) this data protection policy, note however, that Fulchers relies upon Article 6(1)(b) of the G.D.P.R. (necessary for the performance of a contract).

All data that is held by ourselves or those on our behalf is backed up on at least a daily basis and stored on a server or computer at 15 Cove Road, Cove, Farnborough, Hampshire, GU14 0EH or in the Cloud. Where data is held on, or capable of being accessed by desktop, laptop or tablet computers, that equipment is password protected. Fulchers is registered with the Information Commissioner’s Office. We have satisfied ourselves that all third-parties who hold your data on our behalf will comply with G.D.P.R. from the date of commencement, at the latest.

Our core position in relation to the processing of data is this: ‘Fulchers Solicitors wishes at all times to comply with both the letter and spirit of data protection legislation. We will work openly with you to resolve any concerns that you have’.

If you wish to see the personal data that we hold or request its deletion, please send an email or other written request and we will contact you to facilitate this. We aim to comply with all requests within twenty working days.

We will only collect, use and otherwise handle your personal information when:

- We have your consent for specified, explicit and legitimate purposes (see section 5) – please note that there are very limited circumstances where we rely on your consent as we usually have another lawful basis for processing; and/or
- it is necessary for our legitimate interests in connection with operating the website and our business, in particular:
  - responding to your queries;
  - carrying out occasional marketing activities;
  - providing services and/or information to you;
  - keeping in touch with you and/or your business;
  - hosting and maintaining our website;
  - using in the investigation and/or defence of potential complaints and legal proceedings;
  - preventing and detecting fraud and other criminal offences;
  - ensuring network and information security;

as long as, in each case, these interests are in line with applicable law and your legal rights and freedoms; and/or

- where this is necessary for legal obligations which apply to us (for example, under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and professional obligations to which we are subject by the Solicitors Regulation Authority (SRA) and other professional bodies); and/or
- where this is necessary for the performance of a contract we have with you (for example to provide our services to you, invoice you for our services and investigate and address any fee disputes that may arise) or that you have with a third party. This applies where we use Special Categories of Data or information about criminal convictions and offences in connection with a legal matter; and/or
- where this is necessary to take steps at your request prior to entering into a contract

### **How long do we store personal information?**

It is our policy to retain your personal information for the length of time required for the specific purpose or purposes for which it was collected. Such purposes are set out in this privacy policy.

Where you are a client:

- i. the period the hardcopy file for your matter (including your personal data) will be retained is set out in our terms of business which you were sent with our letter of engagement – please contact [info@fulchers-solicitors.co.uk](mailto:info@fulchers-solicitors.co.uk) for a copy if you have mislaid yours. However, on occasion we may be obliged to store some data for a longer time, for example, where a longer time period is required by applicable laws.
- ii. We will keep your will and any other original documents or deeds until such time as we are informed that you have died or revoke your will (in the case of a will) or you ask for the deeds or documents to be returned to you or destroyed, provided we are not under a legal or professional obligation to retain such a document.
- iii. We do keep electronic records of your matter. We, therefore, keep this for as long as we are obliged under legal and professional obligations. Please note that we must always maintain a record of your name, your contact details, the name of your matter and when your file was opened and closed even if you request us to delete the electronic records of your matter.

Where we keep personal data for a longer period than is set out in our terms of business, we will ensure that your personal data will continue to be treated in accordance with this privacy policy.

### **Requesting Your Information**

If you wish to:

- Access, confirm, correct, rectify, update, supplement, anonymise, block, restrict or delete your personal information;
- Object to our use of your personal information;
- Withdraw your consent;
- If you have any questions about our processing of your personal information; or
- If you would like to transfer your personal information from us to another person or business,

please contact us at [info@fulchers-solicitors.co.uk](mailto:info@fulchers-solicitors.co.uk)

Where you request access to your personal information, we will fulfil your request by sending your copy electronically, unless the request expressly specifies a different method. For any subsequent access request, we may charge you an administrative fee. In order to comply with your request, we may ask you to verify your identity.