

DAVID RUSSELL & CO (SOLICITORS)

PRIVACY NOTICE

This privacy notice describes how David Russell & Co collects and processes Personal Information when we provide legal services (“**Services**”) to our clients. David Russell & Co - operates locally.

In providing the Services, we may be required to process Personal Information of individuals and minors, or individuals that are Personal Representatives or beneficiaries of Deceased clients, parties to conveyancing, litigation civil, commercial and criminal, and including Children Order cases and all types of family matters. This privacy notice applies to any individual whose Personal Information we process in the course of providing the Services (each a “**data subject**” or “**you**”).

SCOPE OF THIS PRIVACY NOTICE

This privacy notice applies when we collect your Personal Information in the course of offering or administering our Services, and it applies to all Personal Information we collect or process about you.

PERSONAL INFORMATION WE COLLECT

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual.

We may collect your Personal Information in the following ways:

- You may provide your Personal Information directly to us if you are our client or via your authorised Agent.
- We may collect your Personal Information from public or private sources authorised by you.

The Personal Information we may collect about you will depend on the type of Service we are providing and the relationship between us but may include:

- Name and contact information;
- Demographic information (such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, employment details, family composition, and dependents); Personal identification documentation and related information such as passport numbers and employee identification numbers;
- Financial and payment data such as bank account numbers and transaction information;
- Information about your property and assets;
- Statements made by or about you;
- Records of communications and CCTV footage; and
- Human resources data, such as job title and role; benefits and compensation information;
- dependent/beneficiary information; educational, academic and professional qualifications information.

Some of the categories of information that we collect are special categories of Personal Information (“**Sensitive Personal Information**”). These include your health records (such as your medical history and reports on medical diagnosis, injuries and treatment); information about your personal characteristics and circumstances of a sensitive nature such as your racial or ethnic origin, sex life, mental and physical health and genetic information; and criminal records, fines and other like judicial records.

We may collect publicly available information such as information available on social media platforms, information about your registered property or assets and information about claims and convictions on public record.

LEGAL BASES FOR PROCESSING PERSONAL INFORMATION

We must have a legal basis to process your Personal Information. In most cases the legal basis will be one of the following:

- For our legitimate interests, for example to provide Services to you, to ensure that the Services we provide are appropriate for your requirements, to improve our Services, manage our risks, maintain accurate transaction records, and manage our business in an efficient way;
- For the legitimate interests of our clients and other third parties
- To comply with our legal obligations such as due diligence and reporting obligations.

We process Sensitive Personal Information on the following legal basis;

- Your consent, where consent is required by law. You may withdraw your consent at any time by contacting us using the details at the end of this privacy notice;
- To establish, exercise or defend legal claims and provide legal advice; or

Where legislation otherwise permits us to process Sensitive Personal Information (for example, where the processing is necessary for statutory purposes).

CROSS BORDER TRANSFER

Your Personal Information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for Personal Information under European Union Law. We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected.

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HOW WE MAY USE YOUR PERSONAL INFORMATION

We use your Personal Information:

- To provide the Services and fulfil our contractual obligations to you;
- To conduct data analysis;
- For fraud monitoring and prevention;
- To help develop new services and to enhance, improve or modify our Services;
- To operate and develop our business activities;
- To carry out background checks and conduct due diligence;
- To perform administrative activities in connection with our Services;
- To exercise, defend or protect our legal rights or the rights of our clients or third parties;
- To comply with legal and professional obligations and to cooperate with regulatory bodies; and
- To engage the appropriate expert on your behalf for the delivery of our legal services to you.

The way we analyse Personal Information for the purposes of risk assessment, fraud prevention and detection, and to report to you as part of the Services that we may process your personal information and to predict risks or outcomes.

We may also aggregate or anonymise information about you. Aggregated or anonymised data is not capable of being used to identify individuals and is not treated as Personal Information under this privacy notice.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We may share your Personal Information with third parties under the following circumstances:

- To third party service providers such as medical, counsel, experts, email delivery, auditing and other services
- If we are obliged to disclose your Personal Information under applicable law or regulation, which may include laws outside your country of residence; and
- In the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

SECURITY AND RETENTION

David Russell & Co maintains appropriate technical and organisational security measures to protect the security of your data against loss, misuse, unauthorised access, disclosure or alteration. These measures are aimed at ensuring the ongoing integrity and confidentiality of Personal Information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will retain your Personal Information for as long as is necessary for our legitimate business interests in the provision of Services to you and also in compliance of the Law Society of Northern Ireland ("**Regulatory Body**") regulations. When we no longer need your Personal Information in connection with the Services, we will then retain your Personal Information for a period of time that reasonably allows us to comply with our regulatory obligations with the Regulatory Body, and service providers or commence or defend legal claims and as is required by legislation. We may retain aggregated or anonymised data (which is not treated as Personal Information under this Privacy Notice) for longer

CHOICE AND ACCESS

David Russell & Company is the controller responsible for the Personal Information we collect and process.

If you would like to review, correct, update, suppress, object to or restrict the processing of your Personal Information or request a copy of Personal Information about you, you may contact us by sending us an email at joan@davidrussellsolicitors.co.uk sending your request by postal mail to the address provided in the "**Contact & Comments**" section below.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. We will also have to advise in relation to our Regulatory Body's Regulations as we may be required to retain Personal Information and will revert back to you after receiving the appropriate confirmations from our Regulatory Body in relation to the deletion of Personal Information. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the Data Protection Commission at info@dataprotection.ie.

CHANGES TO OUR PRIVACY NOTICE

You may request a copy of this privacy notice from us using the contact details set out below. We may modify or update this privacy notice from time to time by notifying or providing a revised version to you. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice of these changes so that you have the opportunity to exercise your rights (e.g. to object to the processing).

CONTACT & COMMENTS

If you have any questions or comments regarding this privacy notice, please contact David Russell & Co, Solicitors, 66 Abbey Street, Bangor, BT20 4JB.