

Privacy notice

WHAT IS THIS ?

When you deal with Tedstone George & Tedstone, you trust us with your information. We take privacy seriously and we are committed to protecting the data you provide to us.

This policy explains when and why we collect personal data about you, how this data is used, the conditions under which it may be disclosed to others, and how it is kept secure.

This policy may change from time to time

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WHO ARE WE ?

Tedstone George & Tedstone are based at Crown Bridge , Penkridge , Staffordshire ST19 5AA .We are the controller of your personal data when you engage us to provide services to you; this means that Tedstone George & Tedstone decides why and how your personal data is processed .Tedstone George & Tedstone is registered with the Information Commissioner under registration number ZA16117 .

HOW DO WE COLLECT YOUR PERSONAL DATA ?

There are many ways in which we collect and process information about you, such as receiving information of which you may be the subject of, such as when you may be an opponent in a matter or a beneficiary. The information we receive may include your contact details, identification information, financial information, employment information and details included in any correspondence and information about you in connection with any matter on which we are engaged to advise our client. If we receive information about you, we will only use that information for the purpose of the matter in which we are connected.

Information that you provide to us

You may provide information about yourself when you make an enquiry to Tedstone George & Tedstone or engage us to provide legal services to you by communicating with us by phone, post, e-mail, or otherwise including additional information that you provide to us during the course of any matter upon which we are instructed whether this is your instruction or another party's instruction.

The information you give to us will include personal information such as your contact details, identification information, financial or billing information, employment information and details included in any correspondence received by you or a third party and information about you in connection with any matter on which we are engaged to advise you or another party to the transaction .

Information we receive from other sources

We may receive or share information about you to or from third parties. Examples of such third parties may be estate agents, banks, mediators, barristers, service providers,

accountants, surveyors, the Courts, experts acting for either party, Land Registry and Regulatory Bodies .

In addition to information obtained during the course of the matter, we may also receive or share information during the course of employment by way of accountants, banks, reference requests, recruitment consultants and Regulatory Bodies.

We may supplement the personal data collected from you with information from publicly available sources, such as information to validate your identity or address, or to perform a credit check.

The information that we receive about you from others includes but is not limited to contact details, biographical, behavioural, fraud, billing and legal information.

Information we collect about you

We may automatically collect information about you which we may observe, detect or create without directly asking you to provide the information to us.

Mandatory information

Please note that your provision of documents for identity verification purposes is necessary for us to comply with our legal and statutory obligations. Failure to provide these documents will result in our being unable to undertake identity verification as required by the Money Laundering Regulations 2017 and, subsequently, we will not be able to act for you or the organisation instructing us, as applicable.

WHAT TYPE(S) OF PERSONAL DATA DO WE PROCESS ABOUT YOU ?

As a law firm dealing with cases and matters, we may process a range of personal data about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers (please note that not all categories may be applicable to you):

Category	Personal data included in this category
Banking/Billing	information used to send/receive funds to/from you or that appears on your bills
Behavioural	your activities, actions and behaviours
Biographical	your life experiences and circumstances, for example expected inheritances
Cardholder	your payment card details
Contact	information which can be used to address, send or otherwise communicate a message to you (ie email address, postal address, telephone number, employer name and job title)
Correspondence	information contained in our correspondence or other communications with you or about you, about our products, services or business

Employment	your previous, current or future employment details Any information which we obtain or share in relation to your employment with Tedstone George & Tedstone.
Identification	information contained in a formal identification document or social security or other unique reference relating to you
Insurance	your insurance applications and any information relating to your insurance claim
Legal	information relating to matters of which we are instructed to act for a party, for example, what your Title Deeds or Wills might say

HOW AND WHY DO WE USE YOUR PERSONAL DATA ?

We may use the information we collect about you in the following ways:

Where it is necessary for us to perform a **CONTRACT** with you

We may use and process your personal data where we have supplied you (or continue to supply you) with any legal services, where we have arranged for the supply of another firm's services to you, or where you are in discussions with us about a particular matter on which you are considering taking advice.

We will use your information in connection with the **contract** for the provision of services when it is needed to carry out that contract or for you to enter into it.

We may also use and process your personal data in connection with our recruitment activities, if you apply for a position with us (whether directly or through a third party) or send your details to us on a speculative basis.

Where we have a **LEGITIMATE INTEREST**

We may use and process your personal data where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes;

to carry out our conflict checks to ensure that we are able to provide services to you;

to enter into and perform the contract we have with you or your business;

for the prevention of fraud and other criminal activities;

to verify the accuracy of the data that we hold about you and to create a better understanding of you as a client and our client's customers (where applicable)

for network and information security purposes to enable us to take steps to protect your personal data against loss or damage, theft or unauthorised access;

to assist in the management of queries, complaints or claims;

to notify you or your business of changes in the law that might affect you or your business;

for the establishment, exercise or defence of our legal rights;

to carry out our client instructions.

Where you have provided CONSENT

We may (but usually do not) need your consent to use your personal information. You have the right to withdraw your consent at any time. Please contact us for further details.

Where required by LAW

Where you engage us to provide legal services to you, we will need to process your personal data and the personal data of third parties in order to comply with our legal obligations, for example under the Civil Procedure Rules or the Family Procedure Rules. We also have a legal obligation to comply with the Solicitors Regulation Authority's (SRA) Code of Conduct and the Financial Conduct Authority Handbook.

It is also a legal requirement for you to provide us with information to verify your identity in connection with anti-money laundering and criminal financing legislation. We will use that information for the purpose of complying with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (or such other legislation that may replace or supersede these Regulations from time to time) unless we have obtained your consent to use it for any other purpose.

We may also use and process your personal data in order to comply with other legal obligations to which we are subject, as follows:

- to** maintain a register of corporate gifts and hospitality to comply with anti-bribery laws;
- to** maintain a record of undertakings where you are either a beneficiary of an undertaking, the subject of an undertaking or the person obliged to perform it;
- to** comply with our other legal and regulatory obligations, e.g. undertaking conflict checks.

In the VITAL INTERESTS of the individual

From time to time in the course of representing individuals who may be troubled, in danger, very young or otherwise unable to exercise due care for their own safety, we may in extreme circumstances use information about our client or a person connected with them in order to take action to protect them.

Special categories of personal data

We may need to use more sensitive personal data (known as "special categories of personal data") about you or others associated with you, for example your family/carers. We will only use this kind of information where:

- we have your explicit consent;
- it is necessary for us to use this information to protect your vital interests or those of another person where it is not possible to obtain consent;
- it is necessary for us to do so in connection with the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; or

in exceptional circumstances, another of the grounds for processing special categories of personal data are met.

Where you have provided us with explicit consent to use special categories of personal data about you, you may withdraw your consent for us to use this information at any time. Please contact us for further details.

Please note that if you choose to withdraw your consent for us to use special categories of personal data about you, this may impact our ability to provide legal or support services to you.

OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL DATA

Our suppliers and service providers

Our work for you may require us to provide information to third parties who will use your information for the purposes of providing services to us or directly to you on our behalf. Such third parties may include insurers, for example.

When we use third party service providers, we only disclose to them any personal data that is necessary for them to provide their services and we have an agreement in place that requires them to keep your data secure and not to use it other than in accordance with our specific instructions.

Others involved in your case or matter

Our work for you may require us to provide information to third parties such as law firms, accountants, barristers, expert witnesses, medical professionals and other professional advisers, who will use your information in connection with your case or matter. They may provide their own services directly to you or to us on your behalf.

Where we are engaged by a third party such as a bank or lender in connection with your contract with them, we may share information with that third party about the progress of the case.

Any third party to whom we disclose information about you will be under an obligation to keep your information secure and not to use it for any purpose other than that for which it was disclosed unless you agree with them otherwise.

Credit/debit card payment processors

All payment information is handled using encrypted technology and we are compliant with the Payment Card Industry Data Security Standards (PCI-DSS). Where you make a payment to us by credit or debit card, we will use the payment card information only for the purpose of processing that specific transaction.

No credit or debit card details are stored once your payment has been processed and the transaction is completed.

When you pay for any services over the telephone, your credit/debit card payment is processed by a third party payment processor, who specialises in the secure online capture

and processing of such card transactions. If you have any questions regarding secure transactions, please contact us.

Other ways in which we may share your personal data

We may transfer your personal data to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal data if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to protect your vital interests, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and clients. However, we will always take steps to ensure that your privacy rights continue to be protected.

WHERE DO WE STORE YOUR PERSONAL DATA ?

All information you provide to us for our use is stored at our offices and also on our secure server.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA FOR ?

If we collect your personal data, the length of time for which we retain it is determined by a number of factors including the type of data, the purpose for which we use that data and our regulatory and legal obligations attached to such use. We do not retain personal data in an identifiable format for longer than is necessary.

We maintain internally a full schedule of types of data and the specified period of time we will retain this for.

Typically, the retention criteria are as follows for the following data types:

Client Data – In relation to retention in case of queries or claims, we will retain client files for a minimum of 20 years .

In relation to retention in accordance with legal and regulatory requirements, we will carefully consider whether we need to retain your personal data after the period described above in case of a legal or regulatory requirement .

Recruitment data - We will retain your application data for up to 12 months following receipt of your application unless we subsequently employ you or you otherwise agreed to extend this timescale .

There may be exceptions to this such as:

when the law requires us to hold your personal data for a shorter or longer period;

if you exercise your right to have the data erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law; or

in limited cases, the law permits us to keep your personal data indefinitely provided we have certain protections in place.

YOUR RIGHTS

You have a number of rights in relation to your personal data under data protection legislation. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal data. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity; or (ii) where we do not need to do this because we already have this information, from the date we received your request.

Accessing your personal data

You have the right to ask for a copy of the data that we hold about you by emailing or writing to us. We may not provide you with a copy of your personal data if it concerns other individuals or we have another lawful reason to withhold that data.

Correcting and updating your personal data

The accuracy of your data is important to us and we are working on ways to make it easier for you to review and correct the data that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other data we hold is inaccurate or out of date, please let us know by contacting us using the details set out at the end of this policy.

Withdrawing your consent

Where we rely on your consent as the legal basis for processing your personal data, as set out under "how we use your personal data", you may withdraw your consent at any time by emailing GDPR@tedstones.com (please use "Withdrawal of consent" as the subject heading of your email).

If you withdraw your consent, our use of your personal data before you withdraw your consent remains lawful.

Objecting to our use of your personal data made about you

Where we rely on our legitimate interests as the legal basis for processing your personal data for any purpose(s), as set out under "how we use your personal data", you may object to us using your personal data for these purposes by emailing or writing to us. If we are in doubt as to our permission to process your data, we will temporarily stop processing your personal data in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection

legislation, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.

Erasing your personal data or restricting its processing

In certain circumstances, you may ask for your personal data to be removed from our systems by emailing or writing to us at the address at the end of this policy. Provided we do not have any continuing lawful reason to continue processing or holding your personal data, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal data where you believe our processing is unlawful, you contest its accuracy, you have objected to its use and our investigation is pending, or you require us to keep it in connection with legal proceedings. We may only process your personal data whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

Transferring your personal data

Where we rely on your consent as the legal basis for processing your personal data or need to process it in connection with your contract or the advice that we may have given you, you may ask us to provide you with a copy of that data. We will provide this to you either in paper format or electronically in a structured, commonly used and machine readable form.

You can ask us to send your personal data directly to another service provider, and we will do so if this is technically possible.

Complaining to the UK data protection regulator

You have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal data. Please visit the ICO's website for further details.

SECURITY AND LINKS TO OTHER SITES

Security measures we put in place to protect your personal data

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website and any transmission is at your own risk. Once we have received your personal data, we have in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Links to other websites

Our website does not contain links to other websites run by other organisations.

MARKETING AND OTHER COMMUNICATIONS

You will not receive Centralised Communications from Tedstone George & Tedstone hence, we will not ask you to complete a preference “opt-in” for these communications .

CONTACT US

Please write to Adam Tedstone at Tedstone George & Tedstone, Crown Bridge, Penkridge, Staffordshire ST19 5AA. Our email address for data protection queries is GDPR@tedstones.com (please use “Data Protection Queries” as the subject heading of your email). If you would prefer to speak to us by phone, please call 01785 712243.

This policy was last updated on 23 May 2018 and will be reviewed next by 23 May 2019.