

## PRIVACY POLICY

At Mackarness & Lunt we respect your privacy and are committed to protecting your personal data. This privacy policy will tell you how we look after your personal data and about your privacy rights. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the chance to deal with your concerns in the first instance. It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.

## HOW WE COLLECT YOUR PERSONAL DATA

You may give us data orally, by completing paperwork, completing forms online or by corresponding with us by post, email, social media, phone or otherwise.

We may also receive personal data about you from third parties and public sources (for example, in a house sale, we may receive personal data about you from the estate agents, or in preparing your Will, your financial advisor may give us some personal data).

## HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to and only where we believe we have a legitimate interest to do so.

Below you will see how and why we plan to use your personal data.

<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To set up your matter file & record information relating to your matter in the file and on our databases	- Performance of a contract with you - Necessary to comply with a legal obligation (to comply with Solicitors Regulation Authority rules)
To perform any contract with you including: - Managing payments, fees and charges - Collecting and recovering money owed to us - Addressing any breach	- Performance of a contract with you - Necessary for our legitimate interests (to recover debts due to us) - Necessary for our legitimate interests (to ensure compliance with contract terms) - Necessary to comply with a legal obligation (reporting any material breach to the Solicitors Regulation Authority)
To manage our relationship with you including: - Notifying you about changes to our terms of business - Notifying you about changes to our business which are relevant to you	- Performance of a contract with you - Necessary to comply with a legal obligation (to comply with Solicitors Regulation Authority rules)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop and grow our business)
To use data analytics to improve our website, products/services, marketing, relationships and experiences	Necessary for our legitimate interests (to define types of people for our products and services, to keep our website updated and relevant, to develop our business and marketing strategy)

## MARKETING

We will get your express consent before we use your personal data for any marketing purpose. We do not sell or share your personal data with any third party for their own marketing purposes.

## OPTING OUT

If you have opted in to receiving marketing messages from us, at any time you can opt out of marketing messages by writing or emailing the office to request this.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

If you do not provide personal data to us and this would prevent us from performing the contract we have with you, or place us in breach of the law, we may have to cancel our contract. We will notify you if this is the case.

#### DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with third parties to help us run our business or carry out our obligations to you.

<b>Third Party</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
Service providers for IT and system administration, and analytics and search engine providers.	<ul style="list-style-type: none"><li>- Performance of a contract with you and processing your payment.</li><li>- To assist us in the improvement and optimisation of our site and to make suggestions about similar goods and services that may be of interest to you.</li><li>- Necessary for our legitimate interests (performing the contract, using your data as we have described in this notice).</li></ul>
Other professional advisers including, lawyers, bankers, credit reference agencies, auditors, accountants and insurers.	Necessary for our legitimate interests (complying with our legal obligations).
HM Revenue & Customs, Solicitors Regulation Authority, other regulators and authorities	Necessary for our legitimate interests (complying with our legal obligations).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### INTERNATIONAL TRANSFERS

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our support services, such as our email account providers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Unfortunately, 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 or via email: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed, used or accessed in an unauthorised way. In addition, we limit access to your personal data to those Partners, employees, agents and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?

We will only retain your personal data 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 data, we consider the amount, 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.

If you would like to know the specific retention period for the different aspects of your personal data, please contact us to request this. In some circumstances we may anonymise your personal data (so that it can no longer

be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request deletion of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to delete your personal data to comply with local law. However, we may not always be able to comply with your request of deletion for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (a) if you want us to establish the data’s accuracy;
  - (b) where our use of the data is unlawful but you do not want us to delete it;
  - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used format.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide some services to you. We will advise you if this is the case at the time you withdraw your consent.
- Pay no fee for these services. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.
- We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.