
GDPR Privacy Notice for Clients (current, past and
prospective), Suppliers and Contacts of
Band Hatton Button LLP

We ask that you read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisor authorities in the event you have a complaint.

Who we are

Band Hatton Button LLP collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use

Information collected by us

In the course of our business as a Solicitors Practice we collect the following personal information when you provide it to us.

- **Clients:** Contact details (individual name, personal or business address, telephone numbers and/or email address as provided to us by our Clients and information necessary for us to advise about and to progress legal matters and transactions or to deal with an initial pre-instruction enquiry. Third party personal information is subject to legal professional privilege and can only be disclosed on client instructions.
- **Suppliers:** Contact details of Suppliers who provide services to us as individuals or of employees in the course of their employer's business.
- **Contacts:** Contact details for individuals who are or have been in some way connected with our business and have given personal information to enable us to stay in contact with them. Security records namely CCTV images, recorded voice calls and visitor logs recording visits and calls to our office.
- **Visitors:** Security records namely CCTV images, recorded voice calls and visitor logs recording visits and calls to our office.

Information collected from other sources

We also obtain personal information from other sources as follows:

- Where we are recommended by a third party;
- Where we are instructed through a third party; or
- Where we receive a recommendation to use a Supplier

How we use your personal information

If you are a **client** we use your personal information to progress the matter about which you have instructed to act on your behalf and after the matter is completed we hold information as a record of your instructions and what we have done for you.

If you are a **prospective client** we use your information as a record of your enquiry. We might also use your contact details to provide you with information about us and our services (see “**contact**” below).

If you are a **supplier** we use the personal information you give to us as a means of contacting you about the goods and services that you have supplied to us.

If you are a **contact** we use your personal information so that we can contact you occasionally with news and other information about our business and events that we invite you to.

If you are a **visitor** we use your contact details as a record of you being at our offices or of your telephone call.

If you use our allocated **car parking** at Earlsdon Park we ask you to produce your vehicle registration number to authorise your stay in the car park.

Who we share your personal information with

We do not routinely share personal information. We will only share **client's** personal information to the extent that is necessary in order to progress the matter or transaction that we are instructed about (eg information that has to be given to the other party to a transaction) or where the services we provide necessarily involve an identified third party supplier (for example a barrister or other expert) or outside organisation (such as the courts or the land registry) in which case we will take reasonable steps to ensure that any information shared will be limited to what is necessary for the specific purpose and will only be processed in accordance with GDPR principles.

To authorise car parking we email your vehicle registration number to the car park operators, Excel Parking Limited (<https://excelparkingservices.co.uk/>), on the day of your visit. They use that information to void any charges that would otherwise apply. The information is only kept as a sent email in line with email deletion policies which is to auto-delete after 6 years.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share personal information with any other third party without the consent or instruction of the individual to do so.

Whether information has to be provided by you and why

Clients must provide us with personal information necessary for us to comply with our legal obligations under Money Laundering Regulations.

Prospective clients must provide us with personal information necessary for us to carry out conflict of interests searches as required by our professional regulations.

How long your personal information will be kept

- If you are a **client** we will hold your personal information for at least 6 years after we have completed the work that we do for you. Client files are destroyed when the matter is completed and an electronic copy is kept for 6 years. We will tell you about any original documents that you have asked us to store on your behalf and they will be kept until they are returned to you or destroyed on your instruction. We will tell you if we intend to keep a copy of your file for more than 6 years.
- If you are a **prospective client** we will keep a record of your enquiry for up to 2 years.
- If you are a **supplier** we will hold your name and address (inc email and telephone) for at least 6 years after you have completed the work that you have done for us and beyond that we will only keep that information for so long as we think we might need to contact you about further work that you might be able to do for us.
- If you are a **contact** we will hold your contact details only for so long as we reasonably consider that the information we might provide to you is relevant to and of interest to you and we will delete your contact details if you ask us not to continue to send such information to you or at any time if we have reason to think that the information is out of date and in any case no longer than for 6 years after you last contacted us.
- If you are a **visitor** we keep CCTV records for a rolling 30 day period and telephone calls are kept for a maximum of 6.5 years.
- CCTV for rolling 30 day period and telephone calls are kept for a maximum of 6 years, 6 months.
- If you, as a **visitor**, use our car park facilities, we keep your registration details as a sent email until it is deleted in line with our email policy which is to autodelete after 6 years.

Reasons we can collect and use your personal information

- If you are a **client** we rely on the fact that it is necessary for us to have and to use that information for the performance of our contract with you as the lawful basis on which we collect and use your personal data.
- If you are a **prospective client** we keep your information to assist with any follow-up enquiry and we rely on our legitimate business interests as the legal basis for doing so. Our legitimate interests are so that we can follow your enquiry and make you aware of how we might be able to assist you. Unless you instruct us to act for you in connection with your enquiry, and a client file is opened, we will keep our record of your enquiry for no longer than 2 years, which we believe is appropriate to allow for any further or follow up enquiry relating to the same issue.
- If you are a **supplier** we rely on our legitimate interests as the lawful basis on which we collect and use your personal data. Our legitimate interests in this regard are two-fold. Firstly, we might need to contact you about the work that you have done for us. Secondly, we might need to contact you about further work that we would like you to do for us.
- If you are a **contact** we rely on our legitimate interests as the lawful basis on which we collect and use your personal data. Our legitimate interests are to keep you informed of our services and other information about our business we reasonably consider might be of interest to you. This will be limited to information sent to you by email to your business email address and with every communication you will be given a clear and straightforward option to opt out of further

communications and to ask us to delete the personal information that we hold about you. We have considered the risk of harm to your privacy rights and to your data security and have concluded that the risk is minimal given (i) the type of data (your contact details) that we process for this purpose, (ii) the method, volume and content of the communications that we might send to you (occasional emails, not more often than monthly, related to the services that you have previously ordered from us) and (iii) your right to opt out of further communications and to ask us to delete your information from our records at any time.

- Any unrequested contact by electronic communication to a personal (not business) account will respect your personal e-privacy rights by being restricted to the use of e-contact details that you provided to us in connection with the supply by us to you of services that you paid us for and limited to the same or similar goods and services.
- If you are a **visitor** or a **caller** we rely on our legitimate interests as the lawful basis on which we keep a record of either CCTV image of people entering the building, a visitor's entry book of names of people passing beyond the client/public areas of the building and voice recordings of telephone calls answered through our switchboard. That legitimate interest is the security of our staff and premises. The personal data we record is limited to what is necessary to act as a record of who has called at or telephoned our offices and is not used to identify individuals for any other purpose. If you are using our **car park** facility we require your vehicle registration number in order to authorise your stay in our car park.

Consequences of our use of your personal information

We do not believe that there are likely to be any serious consequences to you of our use of your personal information. The potential consequences that we have identified are:

- The risk of the personal information that we hold about **clients** being accidentally lost or used or accessed in an unauthorised way. We have taken steps to protect against this (please see further information under the heading "Keeping your personal information secure" below); and
- **Former clients** and **contacts** might, from time to time, receive unsolicited communications from us. However, we do not believe that the frequency, content or manner of these communications will risk any breach of your privacy rights and with every communication you will be given a clear and straightforward option to opt out of further communications and to ask us to delete the personal information that we hold about you.

Transfer of your information out of the EEA

We do not intend that any processing of your personal information by us will involve it being transferred outside the EU.

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- Access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- Require us to correct any mistakes in your information which we hold;

- Require the erasure of personal information concerning you in certain situations;
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- Object at any time to processing of personal information concerning you for direct marketing;
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- Object in certain other situations to our continued processing of your personal information;
- Otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- Email, call or write to us c/o Leigh Mollison, Quality Manager, at Band Hatton Button LLP, Earlsdon Park, 53-55 Butts Road, Coventry CV1 3BH; T: 024 7649 3118; E: LMM@bandhattonbutton.com;
- Let us have enough information to identify you and your relationship with us;
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- Let us know the information to which your request relates.

If you would like to unsubscribe from any email newsletter you can also click on the 'unsubscribe' button at the bottom of the email newsletter. It may take up to 5 working days for this to take place.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <http://www.getsafeonline.org>. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: [0303 123 1113].

Changes to this Privacy Notice

This Privacy Notice was published November 2019.

We may change this Privacy Notice from time to time - when we do, we will inform you via our website and newsletter.

How to contact us

Please contact us if you have any questions about this Privacy Notice or the information we hold about you.

If you wish to contact us please send an email to our Compliance Partner, Jon Wilby, via JJW@bandhattonbutton.com or write to him at Band Hatton Button LLP, Earlsdon Park, 53-55 Butts Road, Coventry CV1 3BH.