

1. About this notice

This notice gives you information about how we use your personal data, and the rights that you have in your data.

We are a 'data controller'. This means that we are responsible for deciding how and why we hold and use personal information about you, and explaining it clearly to you.

This notice applies to prospective, existing and former: Clients of VWV (including employees and representatives of our corporate Clients); individual and business contacts and prospects; referrers; individuals who request information from us; any person who provides services to us, either as an individual or as the employee or representative of a corporate service provider; third parties acting for our Clients; parties on the other side of our Client matters and lawyers acting for such parties.

It is important that you read this notice, together with any other privacy information or notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We reserve the right to update this transparency notice at any time. We will provide appropriate notice of such changes and recommend that you regularly check our website for updates to this transparency notice. We may also notify you in other ways from time to time about the processing of your personal information.

Our Compliance and Practice Standards team is responsible for overseeing VWV compliance with data protection law. If you have any questions about this transparency notice or how we handle your personal information, please contact 0117 314 5609 or compliance@vww.co.uk.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the course of our engagement with you.

2. Who we are

This notice applies to the following (referred to as **VWV Entities** in this notice):

- Veale Wasbrough Vizards LLP (**VWV LLP**);
- Narrow Quay Consulting Limited (**NQHR**);
- VWV My Onstream Limited (**My Onstream**); and
- VWV Legal Services Limited.

In this notice, a reference to "VWV" or to "us, we, our" is a reference to all of the VWV Entities, as the context requires. A reference in this notice to the contract we have with you is a reference to the contract between you and the relevant VWV Entity that you have contracted with.

VWV approach and Augustine's Injury Law are trading names of VWV LLP and VWV LLP is a data controller of all information processed by VWV approach and Augustine's Injury Law.

We may add to the list of VWV Entities as our business develops.

Information may be shared between the VWV Entities for the purposes set out in this notice. In particular we will share information to enable us to market and promote our products and services

to you and others. For example, if you are a client of VWV LLP, VWV LLP may share information with NQHR to enable NQHR to inform you about their services.

If you ask us to act as an executor on a will, or act as a trustee, then we may share information with Veale Wasbrough Executor and Trustee Company. We will provide further information if this is relevant to you.

3. What information do we hold?

Personal data, or personal information, means any information about an individual from which that person can be identified.

There are special categories of more sensitive personal data which require a higher level of protection (see further at section 5, below).

We collect different information depending on your relationship with us (click on the appropriate link, below, to see more about the categories of personal information from you and purposes for which we use it).

- Individual Clients
- Individual prospects and other non-client contacts
- Individual service providers
- Corporate Clients, suppliers and third party contacts and prospects
- Parties on the other side in client matters

In each case we have identified our lawful basis for processing. These are described in more detail at section 4 Our lawful basis for using personal information.

4. Individual Clients

We process:

- your name, address and contact details. Such processing is necessary for performance of the contract between you and the VWV Entity that you are contracting with
- Anti-Money Laundering and Know Your Client information (see section 7 below). We do this to comply with our legal obligations and as necessary for the legitimate interest of understanding who we are contracting with.
- information relating to your legal matter and our instructions. If you are a private Client, this may include information about your family or other third party beneficiaries. Such processing is necessary for us to perform our contract with you for the provision of legal advice (or other services) or to provide the services that we have agreed to provide
- your bank details. Such processing is necessary for performance of a contract where we are required to pay funds to you (for example on completion of a sale of property)
- personal information contained in documents reviewed by us as part of any due diligence and provided to us in disclosure. Such processing is necessary for the purpose of providing legal advice and to perform our contract with you
- your personal information in connection with the performance of the contract between us and to the extent necessary for our legitimate interests in managing the contract. This includes recovery and payment of our fees

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- your marketing preferences and details of any services you have subscribed to and/or events you have attended. Such processing is necessary for the legitimate interest of promoting and growing our business
 - background information about you and your relationship with VWV, to inform and improve the service we provide to you. This may include lifestyle information and information about your family. Such processing is necessary for the legitimate interest of informing and improving the service we provide to you
 - feedback you provide to us on our services. Such processing is necessary for the legitimate interest of managing our business and improving our services

To the extent permitted by law, we may monitor electronic communications for the purposes of ensuring compliance with our legal and regulatory obligations and internal policies. This processing is necessary for the legitimate interest of managing our business and compliance obligations.

We use information from our Client Relationship Management ('CRM') systems to monitor your engagement with our digital content in accordance with our Cookies Policy for the legitimate interest of informing and improving the service we provide to you and future product and service development.

We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

5. Individual prospects and other non-client contacts

We process:

- your name, address and contact details
- your marketing preferences and details of any services you have subscribed to and /or events you have attended
- feedback you provide on events or marketing campaigns
- background information about you and your relationship with the firm, to inform and improve the service we provide to you

Such processing is necessary for the legitimate interest of promoting and growing our business and improving our services.

We use information from our CRM system to monitor your engagement with our digital content in accordance with our Cookies Policy for the legitimate interest of informing and improving the service we provide to you, and future product and service development.

We process any feedback you provide to us in relation to our services including your decision whether or not to instruct us. Such processing is necessary for the legitimate interest of managing our business and improving our services.

To the extent permitted by law, we may monitor electronic communications for the purposes of ensuring compliance with our legal and regulatory obligations and internal policies. This processing is necessary for the legitimate interest of managing our business and compliance obligations.

We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with details of the information that

we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

6. Individual service providers

We process:

- your name, title and business contact information including addresses, telephone numbers and email addresses
- details relating to the performance of the contract between us, including financial information and bank details for payment

Such processing is necessary for performance of the contract between us.

We may perform due diligence in the form of credit checks and verification of your identity including checking photographic identification and proof of address. We do this to comply with our legal obligations, and as necessary for our legitimate interests of understanding the party or parties with whom we are contracting.

To the extent permitted by law, we may monitor electronic communications for the purposes of ensuring compliance with our legal and regulatory obligations and internal policies. This processing is necessary for the legitimate interest of managing our business and compliance obligations.

We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

7. Corporate Clients, suppliers and third party business contacts and prospects

We process names, titles and business contact information including addresses, telephone numbers and email addresses for your employees and representatives. Such processing is necessary for performance of the contract between us. Where you are an employee of a corporate Client or contractor, we process this information for the legitimate interest of performing our contract with your employer.

If you are a new or prospective Client, we process personal information as part of our Anti-Money Laundering and Know Your Client procedures (see section 7 below). We do this to comply with our legal obligations, and as necessary for our legitimate interests (provided that the interests and fundamental rights of the individual do not override our interests).

We may perform due diligence in the form of credit checks on companies, including checking photographic identification and proof of address of directors and, in some cases, your shareholders, and verification of the company registration details. We do this to comply with our legal obligations, and as necessary for our legitimate interests (provided that the interests and fundamental rights of the individual do not override our interests).

- We process information relating to your legal matter and our instructions.
- If you are an employer, this may include information about your staff.
- For our education institutions, this may include information about pupils, students and parents.
- Processing of this information is necessary for the purpose of providing legal advice to you.

We process personal information contained in documents reviewed by us as part of any due diligence and provided to us in disclosure. Such processing is necessary for the purpose of providing legal advice.

We process your marketing preferences and details of any services you have subscribed to, and any events your employees and representatives have attended. Such processing is necessary for the legitimate interest of promoting and growing our business (provided that the interests and fundamental rights of any individual employees and representatives do not override our interests).

We process any feedback you (your employees or representatives) provide to us on our services. Such processing is necessary for the legitimate interest of managing our business and improving our services (provided that the interests and fundamental rights of any individual employees and representatives do not override our interests).

We process background information about you, and your employees and representatives, and your relationship with us. Such information may include how you found us and what your interests are. Such processing is necessary for the legitimate interest of informing and improving the service we provide to you (provided that the interests and fundamental rights of any individual employees and representatives do not override our interests).

To the extent permitted by law, we may monitor electronic communications for the purposes of ensuring compliance with our legal and regulatory obligations and internal policies.

8. Parties on the other side in Client matters

We process the details of parties on the other side in Client matters for the purpose of carrying out conflict checks. Such processing is necessary for our legal obligations and the legitimate interest of meeting our compliance requirements.

For third parties involved in Client matters, including lawyers and professional advisors acting on the other side of a particular matter, we will collect your contact details and such information about you (and, where applicable, your clients) as necessary for us to advise our Clients, including personal information contained in documents reviewed by us as part of our due diligence and/or as provided to us in disclosure. Such processing is necessary for:

- the purpose of establishing, exercising or defending legal claims
- the legitimate interests of our Client in receiving legal advice from us (provided that the other party's interests and fundamental rights do not override our Client's interests)

We may process your (or, where applicable, your client's) bank details. Such processing is necessary where we are required to pay funds to you (or your client), for example on completion of a sale of property.

To the extent permitted by law, we may monitor electronic communications for the purposes of ensuring compliance with our legal and regulatory obligations and internal policies.

9. How do we collect personal information?

We collect personal information direct from you when you enquire about our services, when we establish you as a Client, if you register with us for an event or to receive updates and information from us, or where we enter into a contract to receive services from you.

We collect further information from you during the period of our retainer or for the duration of your providing services to us.

We collect information about our Clients, and about third parties, from our Clients and from parties acting on the other side in a matter or transaction, or from lawyers or other professional advisors acting on their behalf.

We collect information from other third parties, such as other professionals advising our Clients on a matter, from referrers, partner organisations (if we have run a joint event), and from credit reference agencies or other background check agencies.

We may collect information about our Clients and about third parties from public sources, such as Companies House or the Land Registry, from an online search or from social media sites.

10. Our lawful basis for using personal information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- where we need to perform the contract we have entered into with you
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Where we rely on legitimate interests for our processing, we will advise you of the relevant interest
- where we need to comply with a legal obligation
- otherwise, with your consent

We may also use your personal information in the following situations, which are likely to be rare:

- where we need to protect your vital interests (or someone else's interests)
- where it is needed in the public interest

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

11. How we use particularly sensitive personal information

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using the following types of personal information.

Depending on the nature of our instructions, we may collect, store and use any of the following special categories of information about Clients and prospective Clients and/or about parties on the other side of the matter:

- physical or mental health, including any medical condition or disability
- nationality, race or ethnicity
- political opinions
- religious or philosophical beliefs
- trade union membership
- sexual orientation or sex life

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- genetic information and biometric data
 - information relating to criminal convictions and offences

We process this type of information where it is necessary to establish, exercise or defend a legal claim.

We may process particularly sensitive personal information if we are under a legal obligation to do so, or if it becomes necessary to protect your vital interests or those of another person, or for reasons of substantial public interest.

We may process information:

- relating to a health condition or disability in order to make reasonable adjustments in the provision of our services
- where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public
- about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. We make every effort to anonymise such information

We may approach you for your written consent to allow us to process certain particularly sensitive information. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

12. Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. Except where this is necessary in the course of legal advice or other services that we provide, we do not envisage that we will hold information about criminal convictions.

We may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

13. Anti-Money Laundering and Know Your Client Information

We are required by law to verify the identity of all new Clients and, in certain circumstances, existing Clients. In addition, our internal requirements may require us to conduct background checks on new or existing Clients. These may necessitate verification of the identity and good standing of Clients. For corporate Clients this will include verifying one or more of their directors or other officers, and verifying the identity of shareholders, beneficial owners, management and/or other relevant background information.

We may require evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with Clients, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from the prospective or current Client, or through the use of online sources, or both. We may also be required to make detailed enquiries of any unusual transactions such as the transfer of large amounts of cash.

In some circumstances we may decline to, or may not be permitted to, act until such procedures have been completed. We reserve the right to decline to act or, if appropriate, cease to act should these procedures not be completed to our satisfaction.

Where we instruct counsel or other professionals on behalf of Clients, they may request us to provide them with copies of evidence of identity of Clients or their representatives which we have

obtained from you or from other sources. We will be entitled to send such copies to them if we so decide.

14. Who do we share your personal information with?

We will share your personal data with third-party service providers who provide services to us and to other third parties who use your information, as data controller, for their own purposes.

If you are a Client, we share your personal information with other data controllers where required by law, for example if we are required to share information in accordance with our Anti-Money Laundering procedures, or to meet our regulatory requirements or as required by our insurers.

We share personal information with:

- the Solicitor's Regulation Authority (SRA), HMRC or other government or law enforcement agencies
- our insurance providers and our professional indemnity insurance broker
- Lexcel (the Law Society's legal practice accreditation service) and other auditors, for the purpose of auditing VWV LLP's compliance with our its obligations (including Anti-Money Laundering requirements) and the SRA rules

We may share your information if we refer you to a third party adviser for specialist advice or if we are prevented from acting for you due to a conflict.

Where we share information with other data controllers, they are responsible to you for their use of your information and compliance with the law.

The following activities are carried out by third-party service providers on our behalf: office and client administration, security, video conferencing and online training platforms; archiving; document and records management (this includes using software to help us manage large volumes of documents); confidential waste disposal; IT support and maintenance; hosting our website (including analytics); marketing campaigns; payment; carrying out surveys; obtaining feedback on our services; and providers of anti-money laundering and "know your client" services.

If you are a delegate at an event, or if you attend training that we provide, we may share names and contact details with third party event organisers and with other attendees, unless you ask us not to.

We may share your personal information with other third parties in the context of the negotiations for a sale or restructuring of the business.

15. Transferring information outside the UK and the European Economic Area (EEA)

All our personal information is hosted on servers located within the UK or the EEA.

If we transfer information outside the UK or the EEA, we have put in place the appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

If you are based outside the EEA we may transfer personal information to the correspondence address you provide to us. We will take all reasonable steps to ensure that such transfers are secure. By instructing us from outside the EEA you acknowledge and agree that such transfers are necessary for us to provide services to you.

16. How do we keep your personal information safe?

We have put in place robust technical measures to protect the security of your information. Details of these measures are available upon request.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and where they are subject to a duty of confidentiality.

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

17. How long do we keep your personal information?

We will only retain your personal information for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where a minimum retention period is required by law (such as retaining records for HMRC purposes or for compliance with the SRA requirements, or anti-money laundering law), we comply with that minimum period plus up to 12 months to allow time for us to anonymise or delete information in accordance with our internal data management processes.

Unless particular circumstances warrant retention for longer periods, we retain Client documents in line with the National Archives recommended best practice and (where applicable) Law Society's recommended retention periods for Client files. We apply the same rules to electronic files as to paper files. Access to archived files is restricted. Please contact compliance@vwv.co.uk if you would like to discuss specific retention periods applicable to your matters.

Our backup and disaster recovery service provider retains a copy of all emails and attachments for 10 years. Access to this information is restricted.

If we are required to retain your information longer than our standard retention periods, we will let you know (unless we are prevented by law from doing so).

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

18. Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- request access to your personal information (commonly known as a 'subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below)

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- object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
 - request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
 - request the transfer of your personal information to another party
 - withdraw consent in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to continue to process your information in accordance with another lawful basis which has been notified to you
 - complain to the Information Commissioner's office if you are unhappy with our use of your personal data: you can do this at <https://ico.org.uk/concerns/> .

To exercise any of the above rights, please contact 0117 314 5609 or email compliance@vww.co.uk. If you decide to exercise any of these rights then VWV LLP will coordinate the response with input from the other VWV Entities that are a data controller in respect of your personal data.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Last Updated: July 2020