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**REVIEW DATE:** November 2020 (or when relevant legislation changes)

# Client Privacy Policy



**Beverley Morris & Co.**  
S O L I C I T O R S

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## **1. ABOUT THIS POLICY**

- 1.1 In this Privacy Policy the terms, 'we' or 'us' is Beverley Morris & Co.
- 1.2 Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws.
- 1.3 We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number Z9689559.
- 1.4 Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

## **2. WHAT INFORMATION WE COLLECT**

- 2.1. We process personal information which you give to use:
  - 2.1.1. as a client to provide you with legal services:
  - 2.1.2. whilst acting on your behalf in writing, over the telephone, in person or through our website;
  - 2.1.3. if you request information or assistance from us.

## **3. WHAT PERSONAL INFORMATION WE PROCESS**

- 3.1. This includes:
  - 3.1.1. Personal details such as your date of birth, address, National Insurance number, telephone number and email address;
  - 3.1.2. identity information such as your passport, photo driving licence, bank statements and utility bills;
  - 3.1.3. credit history and records relating to you, your partner or anyone else with whom you are financially linked. (We obtain this information from credit reference and fraud prevention agencies);
  - 3.1.4. family, lifestyle, financial and social circumstances;
  - 3.1.5. financial details such as your income and information about your bank accounts;
  - 3.1.6. employment/self-employment details.

#### **4. SPECIAL CATEGORIES OF PERSONAL DATA**

- 4.1. Special categories of personal data include information about an individual's health and other categories of personal information which are closely protected.
- 4.2. We do not generally process such information unless you have voluntarily provided it to us, or it is relevant to the legal service you have asked us to provide such as in Family & Matrimonial matters, or where you have advised us of an issue, such as your health, which could mean that you may be classed as a “vulnerable client”. We will process sensitive information where you have provided it to us and have agreed that we may use it to deliver products and / or services to you. Where possible, we shall seek to minimise the collection and use of such special categories of personal data.

#### **5. HOW WE USE YOUR INFORMATION**

- 5.1. We use your information to:
  - 5.1.1. provide legal services to you;
  - 5.1.2. provide and service your relationship with us;
  - 5.1.3. comply with legal obligations for the prevention of financial crime and money laundering.
- 5.2. We will process your information in order to meet our contractual obligations to you:
  - 5.2.1. where we have a legitimate interest to do so;
  - 5.2.2. where we are permitted by law; or
  - 5.2.3. to comply with applicable laws and regulation.

PURPOSE	LEGAL BASIS
Providing a service and internal processing	
To assess your needs and provide you with suitable products and services.	<ul style="list-style-type: none"><li>• Contractual obligation to provide you with a proposal including an estimate of our costs.</li><li>• Where special categories of personal data are processed, these are necessary to assess your needs.</li></ul>

To service and administer your matter including billing.	<ul style="list-style-type: none"> <li>• Legitimate interests to provide and manage the service.</li> </ul>
To verify the identity of our clients.	<ul style="list-style-type: none"> <li>• To comply with legal obligations to prevent money laundering.</li> </ul>
To confirm, update and improve our client records.	<ul style="list-style-type: none"> <li>• To comply with legal obligations in the Data Protection legislation.</li> </ul>
To provide you with any information on the services that you have requested.	<ul style="list-style-type: none"> <li>• To meet our contractual obligation to provide information on the services you have requested.</li> </ul>
Relationship Management	
To manage and develop our relationship with you.	<ul style="list-style-type: none"> <li>• Legitimate interest to service your matter and improve our service to you.</li> </ul>
To inform you of products and services that may be of interest to you where you have chosen to be made aware of this.	<ul style="list-style-type: none"> <li>• With your consent.</li> </ul>
Training and development	
For training purposes and to improve our service to you.	<ul style="list-style-type: none"> <li>• Legitimate interests to improve our services and develop our employees.</li> </ul>
Complying with Legal Obligations	
To prevent, investigate and prosecute crime, fraud and money laundering.	<ul style="list-style-type: none"> <li>• To comply with legal obligations for prevention of financial crime and money laundering.</li> </ul>
For auditing purpose.	<ul style="list-style-type: none"> <li>• To comply with our legitimate interest to conduct audits.</li> </ul>
If we are obliged to disclose information by reason of any law, regulation or court order.	<ul style="list-style-type: none"> <li>• To comply with legal obligations.</li> </ul>
Other	
To transfer information to any entity which may acquire rights in us.	<ul style="list-style-type: none"> <li>• Legitimate interests for commercial interests.</li> </ul>

For any other purpose to which you agree.	<ul style="list-style-type: none"> <li>• With your consent.</li> </ul>
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## **6. HOW WE RETAIN YOUR PERSONAL INFORMATION**

6.1. We will retain your personal information in accordance with applicable laws.

6.2. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set out above.

6.3. Our retention periods are:

Type of Personal Information	Retention Period
General personal data which includes your normal personal data, personal identity and personal financial data.	<ul style="list-style-type: none"> <li>• 6 years after the end of our business relationship with you.</li> </ul>
Client due diligence material which includes copies of your passport, drivers licence, bank statements and any associated documents and explanations you have given to us to prevent fraud, financial crime and money laundering	<ul style="list-style-type: none"> <li>• 6 years after the end of our business relationship with you, or the end of your matter whichever is the later.</li> </ul>
Special categories of personal data	<ul style="list-style-type: none"> <li>• 6 years after the end of our relationship with you.</li> </ul>

## **7. HOW WE SHARE YOUR INFORMATION**

7.1. Where necessary or required we share information with:

7.1.1. Regulatory authorities to comply with our legal obligations;

7.1.2. Credit reference agencies to check your identity in accordance with our legal obligations;

7.1.3. Property search companies to identify any issues that might influence your decision to buy or sell a property;

7.1.4. Insurers for the purpose of providing you with appropriate financial cover for an identified insurable risk, or in connection with any claim made by you against us;

- 7.1.5. Property agents, brokers, lenders or other solicitors involved in your transaction representing other party(ies) in your matter to enable them and us to fulfil our obligations to you;
- 7.1.6. Other Government Departments such as HMRC, Companies House, Probate Registry, Court of Protection or HM Land Registry to fulfil your and our legal obligations;
- 7.1.7. Experts and barristers required to work on your matter;
- 7.1.8. Our auditors and external assessment bodies to achieve and maintain any regulatory or quality assurance standards and accreditations which meet our legal obligations and enable us to provide quality legal services to you.

## **8. INFORMATION SECURITY**

- 8.1. We invest appropriate resources to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

## **9. UPDATES**

- 9.1. We will keep this Privacy Policy under review and make updates from time to time. Any minor changes to this Policy will be posed on our website and we will communicate any major changes to you.

## **10. COOKIES**

- 10.1. Our website uses cookies including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our website.

## **11. YOUR RIGHTS**

- 11.1. You have the right to request copies of your personal information.
- 11.2. If you think any of the personal information we hold about you is inaccurate, you may request that it is corrected or erased.
- 11.3. You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop processing that information and / or to withdraw your agreement to our processing your personal information based on 'consent'.

11.4. This does not, however, apply where we have other legal justification to continue processing your data or an overriding legitimate interest.

11.5. In relation to all of these rights, please write to us at the address below.

## **12. COMPLAINTS PROCESS**

12.1. If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint. You also have the right to complain to the Information Commissioner's Office – ([www.ico.org.uk](http://www.ico.org.uk)).

## **13. CONTACT US**

13.1. You may contact us by writing to our Data Protection Officer, Mrs Angela Stanton, at Beverley Morris & Co., 35 Montpelier Vale, Blackheath Village, London SE3 0TJ.

13.2. Telephone queries may be made to 020 8852 4433.