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Our Data Protection Manager Is the central point of contact for all **Data Subjects** and others in relation to matters of data protection.

## Data protection principles

Anyone **processing personal data** must comply with the data protection principles. These provide that **personal data** must be:

- **Processed** fairly, lawfully, and transparently in relation to the **Data Subject**
- **Processed** for specified, lawful purposes and in a way which is not incompatible with those purposes
- Adequate, relevant, and not excessive for the purpose
- Accurate and up to date
- Not kept for any longer than is necessary for the purpose; and
- **Processed** securely using appropriate technical and organisational measures.

**Personal data** must also:

- be **processed** in line with **Data Subjects'** rights
- not be transferred to people or organisations situated in countries outside the UK without adequate protection.

We will comply with these principles in relation to any **processing of personal data** that we undertake. We set out how we will do this in our [privacy notices](#), published on our website.

## Fair and lawful processing

Data Protection Legislation is not intended to prevent the **processing of personal data**, but to ensure that it is done fairly and without adversely affecting the rights of the **Data Subject**.

For **personal data** to be **processed** fairly, **Data Subjects** must be made aware:

- that the **personal data** is being **processed**
- why the **personal data** is being **processed**
- what the lawful basis is for that **processing** (see below)
- whether the **personal data** will be shared, and if so with whom
- the period for which the **personal data** will be held
- the existence of the **Data Subject** rights in relation to the **processing** of that **personal data**; and
- the right of the **Data Subject** relation to any **processing**.

We will only obtain such **personal data** as is necessary and relevant to the purpose for which it was gathered and will ensure that we have a lawful basis for any **processing**.

For **personal data** to be **processed** lawfully, it must be **processed** on the basis of one of the legal grounds set out in the Data Protection Legislation. We will normally process **personal data** under the following legal grounds:

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- where the **processing** is necessary for the performance of a contract between us and the **Data Subject**, such as an employment contract
  - where the **processing** is necessary to comply with a legal obligation

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This information is contained in our privacy notices. These are available on our website; links are provided to them from the emails we send and are referred to in our standard engagement letter and terms of business.

## Adequate, relevant, and non-excessive processing

We will only collect **personal data** to the extent that it is required for the specific purpose for which it was obtained, unless otherwise permitted by relevant Data Protection Legislation.

## Accurate data

We will ensure that **personal data** we hold is accurate and kept up to date and will take reasonable steps to destroy or amend inaccurate or out-of-date data.

**Data Subjects** have a right to have any inaccurate **personal data** rectified.

## Timely processing

We will not keep **personal data** longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all **personal data** which is no longer required. Further information can be found in our Retention and Destruction Policy, including a Schedule that sets out retention periods in respects of the different categories of information that we hold.

When client matters are set up, a provisional date for closure is set based on the periods set out in the Schedule. The file is then returned or brought to the attention of the relevant fee earner around that date and a decision made as to whether the file has to be retained or can be destroyed.

## Processing in line with Data Subject Rights

We will process all **personal data** in line with **Data Subjects'** rights, in particular their right to:

- request access to any **personal data** we hold about them
- object to the **processing** of their **personal data**, including the right to object to direct marketing
- have inaccurate or incomplete **personal data** about them rectified
- restrict **processing** of their **personal data**
- have **personal data** we hold about them erased
- have their



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# Data Protection Impact Assessments

We take data protection very seriously and will consider and comply with the requirements of Data Protection Legislation in relation to all of our activities whenever these involve the use of **personal data**, in accordance with the principle of data protection by design and default.

In certain circumstances the law requires us to carry out detailed assessments of proposed **processing**. This includes where we intend to use new technologies which might pose a high risk to the rights of **Data Subjects** because of the types of data we will be **processing** or the way that we intend to do so.

We will complete an assessment of any such proposed **processing** and we have a template document which ensures that all relevant matters are considered.



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## Changes to this policy

We may change this policy at any time. Where appropriate, we will notify **Data Subjects** of those changes.



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## Annex B: Rights of Individuals:

### Right of Access

**Data Subjects** may request access to all **personal data** we hold about them. Such requests will be considered in line with our Subject Access Request Procedure.

### Right to Object

In certain circumstances, **Data Subjects** may object to us **processing** their **personal data**. This



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similarly significant effect on individuals. As this is a high-risk area, a Data Protection Impact Assessment (DPIA) must be completed.