

## **Privacy Policy**

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### **Introduction – General Data Protection Regulation**

The General Data Protection Regulation (“GDPR”) came into effect in the UK on 25 May 2018 alongside the Data Protection Act 2018.

Organisations that collect personal data are required to provide certain information on how they collect, use and protect personal information. This is done through a Privacy Notice or by providing Privacy Information. Under GDPR there are some additional matters that we need to inform you of. This includes the lawful basis for processing your data, our retention periods and that you have the right to complain if you believe there is a problem with the way we are handling your data.

### **Who are we**

Bromleys Solicitors LLP is a limited liability partnership, incorporated in England and Wales, and is a “Data Controller” under the General Data Protection Regulation. We are registered with the Information Commissioner’s Office (“ICO”) as an organisation that processes personal data under registration number: Z9165328.

## **What information will we collect from you**

We will only collect information from you that is relevant to the matter that we are dealing with. In particular we may collect the following information from you which is defined as “personal data”:

Personal details

Family, lifestyle and social circumstances

Financial details

Business activities of the person whose details we are processing

We may also collect information that is referred to as being in a “special category”. This could include:

Physical or mental health details

Racial or ethnic origin

Religious beliefs or other beliefs of a similar nature

Criminal convictions

Sexual orientation

## **How we will collect information about you**

Most of the personal information we hold about you is that which we collect directly from you. It may be necessary in certain circumstances to obtain further information about you from another source. For example, we might need to obtain additional information to verify your identity, to comply with money laundering legislation.

## **Electronic information**

If you contact us via our ‘Live Chat’ facility, quotation system or via any of our website enquiry forms, you will need to enter your contact details. Your details will only be used to enable us to provide you with a response to your enquiry. If you do not become a client of Bromleys, we will not keep your enquiry or personal details on file. We may also use the details to provide you with information that is relevant to you such as legal services, legal updates, events and seminars. You can request at any time to [unsubscribe](#) by emailing [bromleys@bromleys.co.uk](mailto:bromleys@bromleys.co.uk) or by telephoning 0161 330 6821.

If you simply visit our website, we will collect limited personal data such as the IP address of the device you are using.

## **Contacting us via email**

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government standards. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Unless you have set your browser to block cookies, this site will place the following cookies on your computer.

Cookie	Name	Purpose	More information
1P_JAR	.google.com	Google advertising cookie used for user tracking and ad targeting purposes.	<a href="#">Click here</a> for an overview of privacy at Google
APISID	.google.com	Google set a number of cookies on any page that includes a Google Map. While we have no control over the cookies set by Google, they appear to include a mixture of pieces of information to measure the number and behaviour of Google Maps users.	<a href="#">Click here</a> for an overview of privacy at Google
CONSENT	YouTube cookie	This cookie carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website. The main purpose of this cookie is targeting/advertising.	<a href="#">Click here</a> for an overview of privacy at YouTube via Google
DV	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Click here</a> for an overview of privacy at Google
GMAIL_RTT	.google.com	Google set a number of cookies on any page that includes a Google Map. While we have no control over the cookies set by Google, they appear to include a mixture of pieces of information to measure the number and behaviour of Google Maps users.	<a href="#">Click here</a> for an overview of privacy at Google
HSID	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Click here</a> for an overview of privacy at Google

MoneyPennyHistory	MoneyPenny.com	MoneyPenny is a provider of outsourced reception. These cookies are used to ensure the chat application works correctly, and to remember users to help with future chat conversations.	<a href="#">Click here</a> for an overview of privacy at MoneyPenny
MoneyPennyRef	MoneyPenny.com	MoneyPenny is a provider of outsourced reception. These cookies are used to ensure the chat application works correctly, and to remember users to help with future chat conversations.	<a href="#">Click here</a> for an overview of privacy at MoneyPenny
MoneyPennyVisit	MoneyPenny.com	MoneyPenny is a provider of outsourced reception. These cookies are used to ensure the chat application works correctly, and to remember users to help with future chat conversations.	<a href="#">Click here</a> for an overview of privacy at MoneyPenny
NID	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Click here</a> for an overview of privacy at Google
OGPC	Google Plus	These cookies are set by Google if the Google+ social plug-in on the website has been activated by the user.	<a href="#">Click here</a> for an overview of privacy at Google
OTZ	Google Plus	These cookies are set by Google if the Google+ social plug-in on the website has been activated by the user.	<a href="#">Click here</a> for an overview of privacy at Google
SAPISID	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Click here</a> for an overview of privacy at Google
SID	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Click here</a> for an overview of privacy at Google

SIDCC	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Click here</a> for an overview of privacy at Google
SSID	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Click here</a> for an overview of privacy at Google

The Live Chat facility may use cookies to allow the system to function. No cookies are used for the website enquiry forms and you can still use this facility if cookies is disabled.

Cookies will only be used to collect anonymous data for analytical purposes only and to ensure our website is active and working correctly. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them. For further information about Cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **How will we use your information**

We will mainly use your personal information to enable us to provide you with legal services, including advising and acting on your behalf, and this is necessary for the performance of the contract between us. We may also use it for:

Administering any accounts

Processing your bank/credit card details in order to obtain payment

The prevention and detection of fraud

Market research

Marketing

Credit reference checks (where appropriate)

### **Who will we share your information with**

Under our Code of Conduct there are very strict rules about who we can share your information with and this will normally be limited to other people who will assist with your matter. This may include:

Barristers

Medical Experts

Private investigators

Healthcare professionals, social and welfare organisations

Courts and tribunals

Ombudsman and regulatory authorities

Where you authorise us we may also disclose your information to your family, associates or representatives and we may also disclose your information to debt collection agencies if you do not pay our bills.

### **Transfers outside of the European Economic Area**

Your personal information in the European Economic Area (EEA) is protected by data protection laws, but other countries do not necessarily protect your personal information in the same way.

The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. We do not transfer your personal data outside of the EEA.

### **Third party providers**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you. We do not allow our service providers to use your personal data for their own purposes.

### **Third party links**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Please check these policies before submitting any personal data to these websites. However, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Children's Online Privacy Protection Act Compliance**

We comply with the requirements of COPPA (Children's Online Privacy Protection Act). We do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

### **How long will we keep your information for**

We will keep your information throughout the period of time that we do work for you and afterwards for a period of up to 7 years, or other period which we will confirm to you separately if applicable as we are required to do by law. Confirmation of retention periods relevant to your matter will be outlined in the client care letter sent to you, if you instruct us to take on the matter. Accounting and financial information is retained for a period of 6 years, plus the current financial year, after the end of the matter.

If you do not become a client of Bromley's we will not retain your enquiry or the personal data contained within it.

## **What rights do you have**

You have a series of rights under the Data Protection Act being:

To obtain access to, and copies of, the personal information that we hold about you

To require that we cease processing your personal information if the processing is causing you damage or distress, and

To require us not to send your marketing communications.

As from 25th May 2018 you also have the following rights:

To be informed of the steps Bromleys' take to keep your data secure

To require us to erase your personal information

To require us to restrict or object to our data processing activities

To receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal information to another data controller, and

To require us to correct the personal information we hold about you if it is incorrect

Please note that these rights may be limited by data protection legislation and we may be entitled to refuse requests where exceptions apply.

## **Data Protection Compliance Officer**

Should you wish to contact Bromleys regarding your data you should initially contact our Data Protection Compliance Officer, Mark Hirst, who can be contacted at our offices. If after he has considered the matter you remain dissatisfied, then you can contact the Information Commission's Office, their website is at: [www.ico.org.uk](http://www.ico.org.uk), and their telephone number is: 0303 123 1113.

**This policy was last modified on 25 March 2019.**

**Bromleys Solicitors LLP - Clear, concise legal advice**

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A: 50 Wellington Road, Ashton-under-Lyne, OL6 6XL

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