PRIVACY POLICY

Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and what to do if you have a complaint.

This privacy policy does not apply to any third-party websites that may have links to our own website.

Clients of this firm should read this policy alongside our general terms and conditions, which provide further information on confidentiality.

1 Who are we and what do we do?

1.1 Pavilion Row is authorised and regulated by The Council for Licensed Conveyancers. It is registered under number 3354. Contact details can be found at section 0 of this policy.

1.2 We collect, use and are responsible for certain personal data about you. When we do so we must comply with the UK General Data Protection Regulation (UK GDPR).

2 Terminology

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Pavilion Row Limited
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

3 Personal data we collect about you

3.1 We collect or use the following information:

Personal data we will collect	**Personal data we may collect depending on why you have instructed us**
Your name, address and telephone number Information to enable us to check and verify your identity, eg your date of birth or passport details Occupation	Your National Insurance and tax details Details of your spouse/partner and dependants or other family members, eg if you instruct us on a family matter or a will Your employment status and details including salary and benefits, eg if you instruct us on

Personal data we will collect	Personal data we may collect depending on why you have instructed us
Marital status Electronic contact details, eg your email address and mobile phone number Information relating to the matter in which you are seeking our advice Information to enable us to undertake a credit or other financial checks on you Your financial details so far as relevant to your instructions, eg the source of your funds if you are instructing on a relevant matter. Payment details (including card or bank information for transfers and direct debits) Information about how you interact with and use our website, products and services Recordings, eg of some of our virtual meetings	matter where your income is relevant.

3.2 The main purpose of collecting and using this information is to provide products and services to you. However, we may also collect and use the above information for the purposes set out in section 5.3.

3.3 If you do not provide personal data we ask for, it may delay or prevent us from providing those services.

4 How your personal data is collected

4.1 We collect most of the above information from you.

4.2 However, we may also collect information:

4.2.1 from publicly accessible sources, eg Companies House or HM Land Registry;

4.2.2 directly from a third party, eg:

(a) sanctions screening providers;
(b) credit reference agencies;
(c) client due diligence providers;

4.2.3 from a third party with your consent, eg:

(a) your bank or building society, another financial institution or advisor;

4.2.4 via our website—we use cookies and similar technologies on our website

4.2.5 via our security, information technology (IT) systems**[**, eg:**]**

(a) via our case management and document management systems;**]**

(b) through automated monitoring of our websites and other technical systems, such as our computer networks and connections and access control systems, communications systems, email and instant messaging systems;

5 How and why we use personal data

5.1 Under data protection law, we can only use your personal data if we have a proper reason, eg:

5.1.1 you have given consent—where we need your consent, we will ask for it separately of this privacy policy and you can withdraw consent at any time;

5.1.2 to comply with our legal and regulatory obligations;

5.1.3 to fulfil our contract with you or take steps at your request before entering into a contract; or

5.1.4 for our legitimate interests or those of a third party.

5.2 A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests You have the right to object to processing based on legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms or the processing is required to establish, exercise or defend legal claims.

5.3 The table below explains what we use your personal data for and why.

What we use your personal data for	**Our reasons**
Providing services to you	To fulfil our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our and/or your legitimate interests, ie to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our clients and verify their identity Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety law or rules issued by our professional regulator	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests

What we use your personal data for	Our reasons
To check whether there is any conflict of interest between us and you and/or between you and another client	To comply with our legal and regulatory obligations
To enforce legal rights or defend or take legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests, ie to protect our business, interests and rights
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests
Ensuring internal business policies are complied with, eg policies covering security and internet use	For our legitimate interests, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: —for our legitimate interests, ie to protect trade secrets and other commercially valuable information —to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, eg in relation to our financial performance, client base, services range or other efficiency measures	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems	Depending on the circumstances: —for our legitimate interests, ie to prevent and detect criminal activity that could be damaging for you and/or us —to comply with our legal and regulatory

What we use your personal data for	Our reasons
	obligations
Updating client records	Depending on the circumstances: —to fulfil our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations —for our legitimate interests, eg making sure we can keep in touch with our clients about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Providing information updates and/or marketing our services to existing and former clients and third parties	Depending on the circumstances: —for our legitimate interests, ie to promote our business —consent (which you can withdraw at any time)
To deal with complaints or claims	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our or your legitimate interests, eg to make sure any potential claim is reported to our insurer
External audits from our regulatory body and the audit of our accounts	Depending on the circumstances: —for our legitimate interests, ie to achieve and maintain relevant accreditations so we can demonstrate we operate at the highest standards

What we use your personal data for	Our reasons
	—to comply with our legal and regulatory obligations

5.4 Where we process special category personal data (see section 2 '**Terminology**'), we will also ensure we are permitted to do so under data protection laws:

5.4.1 we have your explicit consent;

5.4.2 the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent;

5.4.3 the processing is necessary to establish, exercise or defend legal claims; or

5.4.4 the processing is necessary for reasons of substantial public interest.

6 Marketing

6.1 We may use your personal data to send you updates (eg by email) about our services, including exclusive offers, promotions or new services.

6.2 We have a legitimate interest in using your personal data for marketing purposes (see section 5 '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. Where this is not the case, we will always ask for your consent.

6.3 We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

6.4 We will always treat your personal data with the utmost respect and never sell it to OR share it with other organisations for marketing purposes.

7 Who we share your personal data with

7.1 We routinely share personal data with:

7.1.1 third parties we use to help deliver our services to you, eg providers of our case management and finance system, IT service providers including cloud service providers such as data storage platforms, shared service centres and financial institutions in connection with invoicing and payments;

7.1.2 third party external advisors or experts engaged in the course of providing services to you, eg [estate research or missing beneficiary search agents];

7.1.3 companies providing services for money laundering checks and other crime prevention purposes and companies providing similar services, including financial institutions and credit reference agencies;

7.1.4 other third parties we use to help promote our business, eg marketing agencies;

7.1.5 our insurers and brokers;

7.1.6 our bank;

7.2 We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We ensure all outsourcing providers operate under service agreements that are consistent with our legal and professional obligations, including in relation to confidentiality.

7.3 We or the third parties mentioned above may occasionally also share personal data with:

7.3.1 Our external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations

7.3.2 our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations

7.3.3 law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations

7.3.4 other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised but this may not always be possible and the recipient of any of your personal data will be bound by confidentiality obligations

7.4 If you would like more information about who we share our data with and why, please contact us (see '**How to contact us** as section 0).

8 Where your personal data is held

8.1 Personal data may be held at our offices, third party agencies, service providers, representatives and agents as described in section 7 '**Who we share your personal data with**'.

9 How long your personal data will be kept

9.1 We will not keep your personal data for longer than we need it for the purpose for which it was collected or as required by law.

9.2 As a general rule, we will keep your personal data for at least six years from the conclusion of your matter, in case you, or we, need to bring or defend any complaints or claims. However, different retention periods apply for different types of personal data and for different services (e.g.):

9.2.1 we will need to keep information relating to a trust for the duration of that trust and for a minimum of seven years thereafter;

9.2.2 in probate matters where there is a surviving spouse or civil partner, personal data may be retained until the survivor has died, to deal with the transferable inheritance tax allowance;

9.2.3 wills and related documents may be kept indefinitely;

9.3 Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

9.4 If you would like further information about how long we keep your personal data, please contact us (see '**How to contact us** at section 0).

10 Transferring your personal data abroad

10.1 We do not currently transfer your data abroad.

11 Your rights

11.1 You have the following rights, which you can exercise free of charge:

Access	You have the right to ask us for copies of your personal data. You can request other information such as where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for
Rectification	You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete
Erasure (also known as the right to be forgotten)	You have the right to ask us to delete your personal data—in certain situations, subject to our adherence to legal and regulatory obligations.
Restriction of processing	You have the right to ask us to limit how we use your personal data—in certain situations, eg if you contest the accuracy of the data
Data portability	You have the right to ask that we transfer the personal data you gave us to another organisation or to you—in certain situations
To object	You have the right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for our legitimate interests unless we demonstrate compelling legitimate grounds for the processing which override your interests or for establishing, exercising or defending legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	When we use your consent as our lawful basis, you have the right to withdraw that consent at any time You may withdraw consents by [*insert details as relevant depending on consents*] Withdrawing consent will not affect the lawfulness of our use of your

	personal data in reliance on that consent before it was withdrawn

11.2 If you make a request, we must respond to you without undue delay and in any event within one month.

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

11.3.1 email, call or write to us—see section 0 '**How to contact us**'; and

11.3.2 provide enough information to identify yourself [*(eg your full name, address and client or matter reference number)*] and any additional identity information we may reasonably request from you;

11.3.3 let us know what right you want to exercise and the information to which your request relates.

12 Keeping your personal data secure

12.1 We have implemented appropriate technical and organisational measures to keep your personal data confidential and secure from unauthorised access, use and disclosure. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

12.2 We require our business partners, suppliers and other third parties to implement appropriate security measures to protect personal data from unauthorised access, use and disclosure.

12.3 We also have procedures 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 required to do so.

13 How to complain

13.1 Please contact us if you have any queries or concerns about our use of your personal data (see '**How to contact us**' at section 0). We hope we will be able to resolve any issues you may have.

13.2 You may also have the right to lodge a complaint with the Information Commissioner's Office (the UK data protection regulator also known as the ICO).

13.3 The contact details for the ICO are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

14 Changes to this privacy policy

14.1 We may change this privacy policy from time to time. When we do we will publish the updated version on our website.

15 Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, eg your surname or address—see '**How to contact us**' at section 0). How to contact us.

15.1 Individuals in the UK

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Pavilion Row, Renishaw Business Park, 40 Ravenshorn Way, Renishaw, Sheffield, S21 3WY info@pavilionrow.com 0114 2999 584