Client Data Protection Information Notice

1.   Introduction

This document sets out the obligations of Painters Law LLP ("our Firm") regarding data protection and your rights as our client ("data subjects") in respect of your personal data under UK General Data Protection Regulation (GDPR) which sits alongside The Data Protection Act 2018 (DPA 2018).

The GDPR defines "personal data" as any information relating to an identified or identifiable natural person (a "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This letter sets our Firms obligations regarding the collection, processing, transfer, storage, and disposal of your personal data. Our Firm has implemented procedures and polices for our employees, agents, contractors, or other parties working on behalf of our Firm to follow at all times.

Our Firm is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2.   Lawful, Fair, and Transparent Data Processing

The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights as the data subject.

As you are a client of our Firm and have contracted with us to provide you with the necessary legal assistance, under the GDPR we are allowed to process your personal data as a necessity for the performance of the contract.

3.   The Data Protection Principles

The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

1. Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

2. Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

4. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes,

or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject.

6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

4. Your Rights (as a Data Subject)

The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

1. The right to be informed;
2. The right of access;
3. The right to rectification;
4. The right to erasure (also known as the 'right to be forgotten');
5. The right to restrict processing;
6. The right to data portability;
7. The right to object; and
8. Rights with respect to automated decision-making and profiling.

4.1 Keeping You Informed

Our Firm shall provide the information set out below at to every client:

Where your personal data is collected directly from you, you will be informed of its purpose at the time of collection; and

Where your personal data is obtained from a third party, you will be informed of its purpose:

1. if the personal data is used to communicate with you, when the first communication is made; or
2. if the personal data is to be transferred to another party, before that transfer is made; or
3. as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

4.2. Data Subject Access

You may make Subject Access Requests ("SARs") at any time to find out more about the personal data which our Firm holds about you, what it is doing with that personal data, and why.

If you wish to make a SAR you may do so in writing. SARs should be addressed to the Firms Data Protection Officer.

Responses to SARs shall normally be made within one month of receipt, however we may extend by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, you shall be informed.

All SARs received shall be handled by the Firms Data Compliance Manager.

Our Firm does not charge a fee for the handling of normal SARs. However, we reserve the right to charge reasonable fees for additional copies of information that has already been supplied to you, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

4.3   Rectification of Personal Data

You have the right to require us to rectify any of your personal data that is inaccurate or incomplete.

Our Firm shall rectify the personal data in question, and inform the you of that rectification, within one month of you informing our Firm of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

4.4   Erasure of Personal Data

You have the right to request that our Firm erases the personal data it holds about you in the following circumstances:

1. It is no longer necessary for our Firm to hold your personal data with respect to the purpose(s) for which it was originally collected or processed;

2. You wish to withdraw your consent to our Firm holding and processing your personal data;

3. You object to our Firm holding and processing your personal data (and there is no overriding legitimate interest to allow our Firm to continue doing so);

4. The personal data has been processed unlawfully;

5. The personal data needs to be erased in order for our Firm to comply with a particular legal obligation**.**

Unless our Firm has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and you will be informed of the erasure, within one month of receipt of your request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.

In the event that any personal data that is to be erased in response to your request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

4.5 Restriction of Personal Data Processing

You may request that our Firm ceases processing the personal data it holds about you. If a you make such a request, our Firm shall retain only the amount of personal data concerning you (if any) that is necessary to ensure that the personal data in question is not processed further.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

4.6   Objections to Personal Data Processing

You have the right to object to our Firm processing your personal data based on legitimate interests and direct marketing (including profiling).

Where you object to our Firm processing your personal data based on its legitimate interests, our Firm shall cease such processing immediately, unless it can be demonstrated that the Firms legitimate grounds for such processing override your interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

Where you object to our Firm processing your personal data for direct marketing purposes, our Firm shall cease such processing immediately.

4.7. Sharing of Personal Data

During our retainer with you we may share your information with the following entities:

1. Courts and Tribunals
2. Experts required to advise or provide reports
3. Barristers & Barristers Chambers
4. Accountants
5. Opposing Lawyers and representatives
6. Solicitors Regulation Authority
7. Legal Ombudsman
8. Banks and Lenders
9. Mediation and Arbitration service providers
10. Government Bodies
11. Auditors
12. IT support, Infrastructure and System providers
13. Employees of the Firm
14. Contractors to the Firm working on your matter
15. Postal Service Providers including Couriers
16. Insurers and their advisors
17. Land Registry

5. Personal Data Collected, Held, and Processed

The following personal data is collected, held, and processed by our Firm

Data Ref.	Type of Data	Purpose of Data
Client Name	Your Name	To identify you
Address	Your Address	To send letters to you
Email address	Your email address	To send communication via email
Date of Birth	Your date of birth	To identify you
Passport Number	Your passport details	To identify you and comply with Anti money laundering regulations – where applicable
Driving licence	Your driving licence	To identify you and comply with Anti money laundering

Data Ref.	Type of Data	Purpose of Data
number	details	regulations – where applicable
Utility Bill	Your utility bill (s)	To identify you and comply with Anti money laundering regulations – where applicable