

Privacy Policy

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Introduction

Welcome to John Deane's privacy policy.

I respect your privacy and am committed to protecting your personal data. This privacy policy will inform you as to how I look after your personal data when you visit my website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. **[IMPORTANT INFORMATION AND WHO I AM]**
2. **[THE DATA I COLLECT ABOUT YOU]**
3. **[HOW IS YOUR PERSONAL DATA COLLECTED?]**
4. **[HOW I USE YOUR PERSONAL DATA]**
5. **[DISCLOSURES OF YOUR PERSONAL DATA]**
6. **[INTERNATIONAL TRANSFERS]**
7. **[DATA SECURITY]**
8. **[DATA RETENTION]**
9. **[YOUR LEGAL RIGHTS]**
10. **[GLOSSARY]**

1. Important information and who I am

Purpose of this privacy policy

This privacy policy aims to give you information on how John Deane collects and processes your personal data through your use of this website, including any data you may provide through this website.

This website is not intended for children and I do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy I may provide on specific occasions when I am collecting or processing personal data about you so that you

are fully aware of how and why I am using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

John Deane is the controller and responsible for your personal data (referred to as "John Deane" "I", "me" or "my" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise [*your legal rights*], please contact me using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our me in the following ways:

Full name of legal entity: John Deane, Solicitor

Email address: jdeane@johndeane.co.uk

Postal address: 9 Climsland House, Duchy Street, London, SE1 8AF

Telephone number: 07990 861288

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). I would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact me in the first instance.

Changes to the privacy policy and your duty to inform me of changes

I keep my privacy policy under regular review.

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your relationship with me.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I do not control these third-party websites and am not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy policy of every website you visit.

2. The data I collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

I may collect, use, store and transfer different kinds of personal data about you which I have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from me.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from me and your communication preferences.

I do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

If you fail to provide personal data

Where I need to collect personal data by law, or under the terms of a contract I have with you, and you fail to provide that data when requested, I may not be able to perform the contract I have or am trying to enter into with you (for example, to provide you with services). In this case, I may have to cancel a service you have with me but I will notify you if this is the case at the time.

3. How is your personal data collected?

I use different methods to collect data from and about you including through:

- **Direct interactions.** You may give me your Identity, Contact and Financial Data] by filling in forms or by corresponding with me by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for my services;
 - request marketing to be sent to you;
 - give me feedback or contact us.
- **Third parties or publicly available sources.**
- Technical Data from the following parties:
 - search information providers based inside or outside the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. How I use your personal data

I will only use your personal data when the law allows me to. Most commonly, I will use your personal data in the following circumstances:

- Where I need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where I need to comply with a legal obligation.

[Click here \[LINK TO GLOSSARY, LAWFUL BASIS\]](#) to find out more about the types of lawful basis that I will rely on to process your personal data.

Generally, I do not rely on consent as a legal basis for processing your personal data although I will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting me.

Purposes for which I will use your personal data

I have set out below, in a table format, a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what my legitimate interests are where appropriate.

Note that I may process your personal data for more than one lawful ground depending on the specific purpose for which I are using your data. Please contact me if you need details about the specific legal ground I am relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your advice including: (a) Manage payments, fees and charges (b) Collect and recover money owed to me	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for my legitimate interests (to recover debts due to me)
To manage my relationship with you which will include: (a) Notifying you about changes to my terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for my legitimate interests (to keep my records updated and to study how clients use my services)
To administer and protect my business and this website	(a) Identity	(a) Necessary for my legitimate interests (for running my business, provision of

(including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising I serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for my legitimate interests (to study how clients use services, to develop them, to grow my business and to inform my marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for my legitimate interests (to develop my services and grow my business)

Promotional offers from us

You may receive marketing communications from me if you have requested information from me or purchased services] from me and you have not opted out of receiving that marketing.

Third-party marketing

I will get your express opt-in consent before I share your personal data with any third party for marketing purposes.

Opting out

You can ask me or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **or** by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to me as a result of a service purchase.

Change of purpose

I will only use your personal data for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose. If you wish to get

an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact me.

If I need to use your personal data for an unrelated purpose, I will notify you and I will explain the legal basis which allows me to do so.

Please note that I may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

I may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- External Third Parties as set out in the [*Glossary*].
- Third parties to whom I may choose to sell, transfer or merge parts of my business or my assets. Alternatively, I may seek to acquire other businesses or merge with them. If a change happens to my business, then the new owners may use your personal data in the same way as set out in this privacy policy.

I require all third parties to respect the security of your personal data and to treat it in accordance with the law. I do not allow my third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Some of my external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact me if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I limit access to your personal

data to those agents, contractors and other third parties who have a business need to know. They will only process your personal data on my instructions, and they are subject to a duty of confidentiality.

I have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where I am legally required to do so.

8. Data retention

How long will you use my personal data for?

I will only retain your personal data for as long as reasonably necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe there is a prospect of litigation in respect to my relationship with you.

To determine the appropriate retention period for personal data, I consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law I have to keep basic information about my client (including Contact, Identity, Financial and Transaction Data) for six] years after they cease being clients.

In some circumstances you can ask me to delete your data: see [*your legal rights*] below for further information.

In some circumstances I will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case I may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [*Request access to your personal data*].
- [*Request correction of your personal data*].
- [*Request erasure of your personal data*].
- [*Object to processing of your personal data*].
- [*Request restriction of processing your personal data*].
- [*Request transfer of your personal data*].
- [*Right to withdraw consent*].

If you wish to exercise any of the rights set out above, [please contact me [link]

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I could refuse to comply with your request in these circumstances.

What I may need from you

I may need to request specific information from you to help me confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. I may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

I try to respond to all legitimate requests within one month. Occasionally it could take me longer than a month if your request is particularly complex or you have made a number of requests. In this case, I will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of my business in conducting and managing my business to enable me to give you the best service and the best and most secure experience. I make sure I consider and balance any potential impact on you (both positive and negative) and your rights before I process your personal data for my legitimate interests. I do not use your personal data for activities where my interests are overridden by the impact on you (unless I have your consent or am otherwise required or permitted to by law). You can obtain further information about how I assess my legitimate interests against any potential impact on you in respect of specific activities by contacting me.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation to which I am subject.

THIRD PARTIES

External Third Parties

- Service providers acting as processors who provide IT and system administration services].
- Professional advisers acting as processors or joint controllers including lawyers, bankers and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data I hold about you and to check that I am lawfully processing it.

Request correction of the personal data that I hold about you. This enables you to have any incomplete or inaccurate data I hold about you corrected, though I may need to verify the accuracy of the new data you provide to me.

Request erasure of your personal data. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where I may have processed your information unlawfully or where I am required to erase your personal data to comply with local law. Note, however, that I may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where I am relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where I am processing your personal data for direct marketing purposes. In some cases, I may demonstrate that I have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask me to suspend the processing of your personal data in the following scenarios:

- If you want me to establish the data's accuracy.
- Where my use of the data is unlawful but you do not want me to erase it.
- Where you need me to hold the data even if I no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to my use of your data but I need to verify whether I have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. I will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for me to use or where I used the information to perform a contract with you.

Withdraw consent at any time where I am relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, I may not be able to provide certain products or services to you. I will advise you if this is the case at the time you withdraw your consent.