

Dolmans Privacy Notice for clients, prospective clients/introducers and website visitors

1. Important information and who we are
2. The data we collect about you
3. How is your personal data collected?
4. How we 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

INTRODUCTION

Welcome to the privacy notice of Dolmans Solicitors.

Dolmans Solicitors respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you are a client of the firm, when you are in contact with us as a prospective client or introducer of business to the firm, or when you simply visit our website (regardless of where you visit it from) and will tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Dolmans Solicitors collects and processes your personal data through either your becoming a client of the firm, or you contacting us as a prospective client or introducer of business to the firm, or your use of our website, including any data you may provide through our website when you fill in an enquiry form, accept an invitation to a seminar, or sign up to a newsletter.

Our website is not intended for children and we do not knowingly collect data relating to children.

CONTROLLER

The partners of Dolmans Solicitors are the data controllers and are responsible for your personal data (collectively referred to as "Dolmans Solicitors", "we", "us" or "our" in this privacy notice).

Dolmans Solicitors has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to

this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer using the details set out below.

CONTACT DETAILS

Our full details are: Dolmans Solicitors

Name or title of DPO: Adrian Oliver

Email address: adriano@dolmans.co.uk

Postal address: Dolmans Solicitors, Capital Tower, Greyfriars Road, Cardiff, CF10 3AG

Telephone number: 02920 345531

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

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

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

THIRD-PARTY LINKS

Our 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE 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).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, national insurance number, passport number, driving licence and other forms of identity.
- **Contact Data** includes home and other addresses, email addresses and telephone numbers.
- **Employment Data** includes employment and job application details such as employment history, qualifications and equality monitoring information.
- **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 us.
- **Technical Data** includes internet protocol (IP) address, your login data, 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 our website.
- **Profile Data** includes your username and password, purchases of services by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and our services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Company or other Business Data** (if applicable) includes your business' formal name, trading names, previous names, business addresses, registered number, VAT number, officers' employees' and shareholders' Identity Data and Contact Data, and persons with significant control.
- **Legal Matter Data** includes information about you given to us in relation to your legal matter.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect **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 when we are conducting personal injury type matters on your behalf. We also may collect **Criminal Convictions and Offences Data**.

Where we are dealing with a criminal matter on your behalf, we may need to collect information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

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

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your identity, contact, financial and legal matter data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - enquire about or use our services;
 - contact us via our website;
 - use video conferencing software;
 - subscribe to our publications;
 - request marketing to be sent to you;
 - networking (for example, at in-person or virtual events);
 - by virtue of our access to CCTV footage;
 - give us some feedback;
 - Otherwise through providing our legal services and operating our business.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data

about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy on our website for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics and other technology providers (such as Google) based inside and outside the EU;
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU;
 - Identity and Contact Data from introducer websites and other introducers or professional advisors (such as estate agents, surveyors, building societies, banks, accountants, lawyers, medical professionals for personal injury claims, Independent Financial Advisors) based inside or outside the EU;
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU;
 - Legal Matter Data from publicly available sources such as the Land Registry and the Intellectual Property Office, based inside the EU;
 - Legal Matter Data from third parties involved in your legal matter;
 - Press reports and social media;
 - Other members of your family or those providing joint instructions;
 - Your employer (where relevant for personal injury or employment claims).

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where processing of "special category data" is necessary in the context of legal claims or where another legal ground other than explicit consent is available to us under relevant data protection legislation.
- Where our legal services require us to process "special category data" and where we have obtained your explicit consent to do so. If we seek and obtain your consent, you may withdraw it at any time.
- Where we have your consent to send you our publications or invitations to our events.

For special categories of data, we will use your data in the following circumstances;

- Your explicit consent by virtue of the Client Care letter being signed by you and returned to us.
- To protect your vital interests
- To deal with any legal claims on your behalf

Other than for special categories of data, we do not generally rely on consent as a legal basis for processing your personal

data other than in relation to sending any marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are 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 Client or to update our records upon a new instruction and checking your identity for the money laundering regulations.	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To deliver our services to you, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our 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 our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a seminar or event, or complete a survey.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis,	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network

testing, system maintenance, support, reporting and hosting of data)	(c) Technical	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 we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

OPTING OUT

You can ask us to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a legal service we have agreed to provide you with.

COOKIES

We use cookies on our website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy on our

website

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we 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, contact us.

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

Please note that we 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

In the course of providing legal services, we may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Professional advisers acting as processors or joint controllers including Courts, Tribunals, lawyers, bankers, auditors, expert witnesses and insurers based in the United Kingdom or EU who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow 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

Our data is stored on servers within the UK. If there was a need to transfer your personal data out of the EEA, we would 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 by the European Commission.
- Where we use certain service providers, we may use specific contractual provisions approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

7. DATA SECURITY

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

We 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 we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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

To determine the appropriate retention period for personal data, we 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 we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are set out in the terms of business which accompanied your Client Care letter. Further details are available in our retention policy which you can request by contacting us.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we 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.

- 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 our Data Protection Officer.

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, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us 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. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

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

10. GLOSSARY

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

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 or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

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 we hold about you and to check that we are lawfully processing it.

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

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we 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 we are 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 we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we 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 us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We 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 us to use or where we used the information to perform a contract with you.

Third Parties (a) service providers (acting as processors) based in the United Kingdom who provide IT and system administration services; (b) professional advisers (acting as processors or joint controllers) including bankers, auditors and insurers based in the United Kingdom who provide banking services, accountancy services and claims handling services; (c) HM Revenue & Customs, regulators and professional bodies (including the Solicitors Regulation Authority (SRA) and the Law Society in England and Wales) and the Legal Ombudsman's Office (LEO) and other authorities (acting as processors or independent controllers) based in the United Kingdom who require reporting of processing activities (in certain circumstances).

Withdraw consent at any time where we are 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, we may not be able to provide services to you. We will advise you if this is the case at the time you withdraw your consent.