

# **CLM Client Privacy Policy**

At Cater Leydon Millard Limited ('CLM') we take the utmost care in protecting our clients' information. To that end, we have a Privacy Standard we adhere to, and we have things like an Information Security Policy and a Retention Policy to ensure we look after the personal data of our individual clients and also the data relating to past, former and potential future employees of our employer clients, and that we don't hold it for any longer than we need to.

We will only use this personal data to deliver the service you as the client contract with us to perform, and also to meet our legal and regulatory responsibilities.

## **What type of information to we get?**

This will depend essentially on the nature of the work you require us to do, but it is likely to include personal names and addresses; telephone numbers, email addresses and other contact details; contracts of employment; salary and other remuneration details; dates of commencement and termination of employment; and, occasionally, medical records such as medical reports which we may need to see in relation to considering and advising on health-related issues arising in employment such as sickness absence and disability, to take two examples.

## **How do we collect this information?**

We gather this information when you engage us to do work on your behalf, and also in the course of doing that work.

## **How do we use this information?**

We will use the information we collect for the purposes of carrying out the work you require us to do, and specifically for:

- contacting you
- checking identities
- getting instructions so that we can undertake the work for you properly and in line with your requirements

- record-keeping to fulfil our legal and regulatory obligations
- being audited and for the purposes of professional indemnity insurance
- issuing invoices and receiving payments
- preventing fraud and corruption, and in particular monitoring for money-laundering

### **Who can access this information?**

Only CLM staff who are authorised by the firm can see and use the information. We have a Privacy Standard (and other related policies) and all staff have been trained in its use. What is more, we will keep our staff up-to-date on data protection requirements at least once a year.

There are times however when third parties may have to look at our records and may have access to your information: we have to be audited every year for example and so the auditors need to inspect files and records – we ensure however that they have similar data protection standards to ours and that they fulfil the legal requirements.

Also we may have to disclose information to our professional indemnity insurers in connection with annual renewal or in reporting a circumstance or a claim.

Additionally, we are regulated by the Solicitors' Regulation Authority: in certain exceptional circumstances they may need to have access to client data as well.

In court and Tribunal cases, we may instruct Counsel and Counsel will be provided with personal information in preparation for a case and in representing you – again, we will ensure that proper safeguards are in place in our arrangements with barristers.

This may also apply to other third parties whom we need to engage in the course of acting for you: however, we will always only disclose the information necessary for them to provide the service we need from them, and then only with your consent.

Above all, we can assure you that we will never sell your personal information to any third party, and we will not share it with a third party for their marketing purposes.

When we finish working on your behalf on a matter we will arrange for your electronic data to be deleted and any paper files destroyed by a third party organisation specialising in safe

document disposal – but this will only be undertaken after the relevant retention period has elapsed (which will generally be seven years later).

Finally, if we have to disclose information because we have to do so by law, eg under a court order, then clearly we will have to comply.

### **Where will your information be processed?**

We don't envisage sending your information outside the EEA (European Economic Area) for any purpose: if we do, we will let you know and we will also tell you in which country the processing will take place and whether it has clearance from the European Commission.

Generally speaking, your information will be held on our systems but there may be occasions when the data is stored on third-party servers – in which case we will take care that those third parties adhere to legal and regulatory requirements.

### **Your right to see your information and to correct it**

You have a right to see the personal information CLM holds that is yours, or relates to you.

We will keep our information regularly reviewed, and if you know of any change that should be made please contact us as soon as possible at the email or postal address at the end of this notice.

### **Your rights in more detail**

**Access:** you have a right to request a copy of the personal information that CLM holds that is yours or relates to you

**Correction:** CLM will seek to keep your information accurate and up-to-date, and so please let us know if any changes are needed

**Deletion:** you have the right to ask CLM to delete personal information that is yours, or relates to you, in the following cases:

- you consider that CLM no longer requires the information for the purposes for which it was obtained

- you have validly objected to CLM's use of your personal information
- CLM's use of your personal information is contrary to law or legal obligations
- you have withdrawn your consent

**Restriction:** in certain situations you can ask CLM to restrict its use of your personal information. These might include where CLM is checking your data or assessing whether you have a right to object to its use. Alternatively, CLM may consider that it no longer needs to hold your data, but you may be objecting to its deletion. In these circumstances, and only where the right is validly exercised, CLM may only use the information with your consent, in respect of legal claims or where there is a public interest in doing so.

**Objecting:** you have the right to require CLM to cease using your personal information for direct marketing purposes

**Withdrawing consent:** you can withdraw your consent at any time to CLM's using your personal information and the firm will stop using it for the purpose to which you consented

## **The security of your information**

We will do our best to keep your information secure, but when you transfer it to the firm you do so at your own risk and CLM cannot be responsible for any loss of data which happens during transfer.

We operate an information security policy covering all personal data while it is held by CLM or stored on our behalf.

## **Contacting you with updates**

CLM provides a monthly bulletin covering updates in employment law and other related newsworthy items. You will be asked whether you wish to subscribe to this, and if you do, your data will be held by us for that purpose. However you can let us know at any time that you no longer wish to be contacted and to be removed from the list – just email us at the address shown on the CLM website (also set out below).

## **Where this privacy notice can be read; and changes**

CLM will keep a link to this privacy notice on the homepage of its website [www.caterleydonmillard.co.uk](http://www.caterleydonmillard.co.uk) . The firm will also supply a written copy on request.

CLM will keep this notice under review and will post any changes to its website and draw attention to the changes being made.

## **Contacting us...**

The email address for contacting us in relation to any privacy matter is [wl@caterleydonmillard.co.uk](mailto:wl@caterleydonmillard.co.uk)

The postal address is: Cater Leydon Millard Limited, 68 Milton Park, Abingdon, Oxfordshire OX14 4RX

Our registered office is at: 20 Grosvenor Place, London, England SW1X 7HN

CLM's current Data Protection Officer is: Wendy Leydon

## **Complaints**

Whilst we will aim to deal internally with any issue concerning your personal information, you at all times have the right to make a complaint to the Information Commissioner's Office and the contact details for the ICO are:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Telephone: 01625-545745

Website: [www.ico.org.uk](http://www.ico.org.uk)

**Effective Date**

This Privacy Notice is up to date and last reviewed as at 24<sup>th</sup> May 2018.