

# External Privacy Policy

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This privacy policy applies to personal data we process about our suppliers and other external contacts. If you are one of our clients, please see our client facing privacy policy.

When we process your personal data, we comply with the UK GDPR and the Data Protection Act 2018, together with other relevant data protection and privacy legislation (“**Data Protection Legislation**”). Your personal data includes all the information we hold that identifies you, including but not limited to contact details such as your name, email address and postal address.

Everything we do with your personal data counts as processing it, including collecting, storing, amending, transferring and deleting it. We will comply with Data Protection Legislation to make sure that your information is properly protected and used appropriately.

This privacy policy provides information about the personal data we process about you, why we process it and how we process it.

## 1 Our Responsibilities

Clarion Solicitors Limited (“**Clarion**”) is the controller of the personal data you provide. We have appointed our Head of Risk and Regulatory to have day to day responsibility for ensuring we comply with the Data Protection Legislation and dealing with any requests we receive from individuals exercising their rights under the Data Protection Legislation. Our Head of Risk and Regulatory can be contacted at [dataprotection@clarionsolicitors.com](mailto:dataprotection@clarionsolicitors.com).

## 2 The Personal Data we collect about you

2.1 We may collect, use, store and transfer the following kinds of personal data about you:

### 2.1.1 Identity Data

including your full name, marital status, title, date of birth and gender;

### 2.1.2 Contact Data

including your home and business address, personal and business email address and telephone numbers;

### 2.1.3 Financial Data

such as your bank account details where we are transferring funds to your personal account;

### 2.1.4 CCTV

which may include footage of you in our reception area, ground floor and parking area if you attend our office. We use CCTV for the purposes of crime prevention, detection and health and safety; and

### 2.1.5 Event Data

such as your health, dietary, mobility requirements and your vehicle registration number if relevant to an event hosted by us that you are attending.

This is intended to act as a non-exhaustive list of the personal information we may process as a result of the varied nature of our suppliers and other external contacts.

### 3 Artificial Intelligence (AI)

- 3.1 We are committed to providing excellent and innovative legal services, including through use of new and developing technologies. We are trialling a number of AI solutions which may result in your personal data being uploaded to and/or processed through the AI solution. We have carried out due diligence in relation to our AI providers, including those we are working with on a trial basis, to ensure that all environments into which your personal data is uploaded are safe and secure. We also require our AI providers commit to complying with Data Protection Legislation.
- 3.2 We intend to upload your personal data to the AI solution on the grounds of our legitimate interests in providing you with the best possible service, and we will only upload the data that is strictly necessary for us to use the AI solution. If we decide not to continue to use the AI solution, we will ensure your personal data is promptly deleted from it. If we continue to use the AI solution your personal data will remain on it for as long as we use the solution to provide services to you, and thereafter in line with the retention periods set out in this privacy policy.
- 3.3 If you would like more information about the AI solutions we are using or trialling, please contact us at [dataprotection@clarionsolicitors.com](mailto:dataprotection@clarionsolicitors.com) or speak to your Clarion relationship manager or contact.

### 4 How we collect your Personal Data

- 4.1 We collect your personal data primarily from the following sources:
- 4.1.1 directly from you;
  - 4.1.2 from the company for which you work;
  - 4.1.3 from our employees; and
  - 4.1.4 from our existing clients and contacts.

### 5 Why do we process your Personal Data?

- 5.1 If you are providing services to us, we process your personal data in order to fulfil the contract we have entered into with you or the company for which you work, to provide you with information you have requested and to receive services from you or the company for which you work.
- 5.2 If you are one of our business contacts, we will process your personal data to maintain our relationship with you.
- 5.3 We may also process your personal data to:
- 5.3.1 respond to any queries or comments you submit to us, including via our website, and to liaise and correspond with you; and
  - 5.3.2 to send your newsletters and marketing (including about products and services we offer that are the same or similar to those you have purchased, or we feel may interest you) if we are permitted to do so in accordance with the Data Protection Legislation.
- 5.4 We may need personal data from you to be able to enter into a contract with you or the organisation for which you work and provide you with all the information you need. If we do not receive that personal data from you, we may be unable to fulfil our obligations to you or the company for which you work.
- 5.5 We process your personal data on a number of grounds set out in the Data Protection Legislation, depending on the reasons for which we are processing your data:
- 5.5.1 if you supply services directly to us, we will process your personal data on the grounds of fulfilment of our contract with you;

- 5.5.2 if you are a contact of one of our business suppliers, we will process your personal data on the grounds of our legitimate interests in maintaining a relationship with you as our contact;
  - 5.5.3 if you are an external business contact or have submitted an enquiry to us (for example via our website), we will process your personal data on the grounds of our legitimate interests in maintaining our relationship with you and/or responding to the enquiry you have submitted.
- 5.6 If we send you marketing and you are not one of our clients, we may do so on the grounds of our legitimate interests where we contact you using a business email address or otherwise on the grounds of your consent. You will always have the option to unsubscribe from marketing communications we send to you.

## 6 Cookies

We may also process personal data about you through our use of cookies. More information about the cookies we use can be found in our cookie policy, available on our website: [Our cookie policy | Clarion \(clarionsolicitors.com\)](https://www.clarionsolicitors.com/our-cookie-policy). We will only use cookies if you have consented to us doing so, unless they are strictly necessary for our website to function properly in which case we may use cookies without your consent.

## 7 Who will receive your Personal Data?

- 7.1 We only transfer your personal data to the extent we need to. Recipients of your personal data include:
- 7.1.1 third party suppliers of archive and storage services;
  - 7.1.2 our data centre;
  - 7.1.3 third parties that maintain, monitor and support our IT systems, infrastructure and networks;
  - 7.1.4 other professionals to whom you have asked us to refer you;
  - 7.1.5 consultants of Clarion Advisory LLP (an associated entity providing legal services to Clarion via its members);
  - 7.1.6 professional or legal advisers to the extent they need to see your personal data to provide us with legal or other advice; and
  - 7.1.7 third party providers of email marketing and other marketing platforms.
- 7.2 We only allow service providers to process your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also ensure there are contractual obligations on service providers requiring them to only use your personal data to the extent necessary to provide services to you and us.
- 7.3 We may transfer your personal data outside of the UK where you have asked us to liaise on your behalf with a lawyer, professional or other adviser or contact in a country outside of the UK or where other external third parties (such as our service providers or suppliers) or their sub-processors are based outside of the UK. We will transfer you data only: (i) to countries that have been deemed to provide an adequate level of protection for personal data; or (ii) where we have an agreement in place with the organisation that includes appropriate safeguards in respect of the transfer of your data.

## 8 How we keep your Personal Data secure

- 8.1 We have appropriate technical and organisational measures in place to protect data. We limit access to data to those who have a genuine business need to access it. Those processing data will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are Cyber Essentials PLUS certified which means we follow industry standards for information security.

8.2 We also have procedures to deal with any suspected data breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## 9 How long will we keep your Personal Data?

9.1 If you supply services to us or are one of our external contacts, we will retain your data for a maximum of 12 years from the date of our last correspondence with you. All online copies of emails that have been received to or sent by a Clarion email address will be deleted after 13 years.

9.2 If you are a professional contact of Clarion, we may retain your personal data for longer than the 12 year period if we have a continuing relationship with you or the organisation for which you work.

9.3 We retain your information for this period in case any issues arise or in case you have any queries, and to make sure we retain all information required by our insurance policies.

9.4 If you would like more information about the period for which we keep your data, please contact our Head of Risk and Regulatory at [dataprotection@clarionsolicitors.com](mailto:dataprotection@clarionsolicitors.com) or your Clarion relationship manager or contact.

9.5 Your information will be kept securely at all times, whether at Clarion or with a third-party archive and storage provider. Following the end of the relevant retention period, your files and personal data we hold about you will be permanently deleted or destroyed. If we are required to obtain your consent to send you marketing communications, any information we use for this purpose will be kept until you withdraw your consent and thereafter on a secure, restricted access suppression list to make sure we do not send any further marketing to you unless you ask us to.

## 10 What are your Rights?

10.1 Clarion will always seek to process your data in accordance with our obligations, our rights and your rights. You benefit from a number of rights in respect of the personal data we hold about you. We have summarised your rights below and they apply for the period in which we process your data.

10.2 You have a right of access to your data processed by Clarion commonly known as a 'subject access request'. In certain circumstances, you have the right to seek the erasure or correction of your data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your data. You also have the right to request the transfer of your data to another party in a commonly used format.

10.3 If you wish to exercise any of your rights, please contact [dataprotection@clarionsolicitors.com](mailto:dataprotection@clarionsolicitors.com). Please note that we may need to take appropriate steps including making enquiries of you to help us confirm aspects such as your identity and to ask further information about your rights request. Generally, we will respond to your rights requests without undue delay and within one calendar month of receiving the request.

10.4 Please note that you will not be subject to decisions based solely on automated data processing (automated data processing means making a decision solely by automated means without any human involvement). For more information on your rights, please see the Information Commissioner's Office ("ICO") website ([For the public | ICO](#)).

## 11 Your right to Complain about Our Processing

11.1 If you think we have processed your personal data unlawfully or that we have not complied with the Data Protection Legislation, please let us know in the first instance so we can help. Please send your concern/complaint to [dataprotection@clarionsolicitors.com](mailto:dataprotection@clarionsolicitors.com). We will acknowledge receipt of all data protection related complaints within 30 days and will take steps to respond to the complaint and inform of the outcome without undue delay.

11.2 Please note that we may need to take appropriate steps including making enquiries of you to help us confirm aspects such as your identity and to ask further information about your complaint so that we may speed up our response.

11.3 You also have the right to raise any concern or complain to the ICO. The ICO's contact details are as follows:

ICO complaints: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

Telephone: +44 (0) 303 123 1113

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

## 12 Any Questions?

If you have any questions or would like more information about the ways in which we process your data, please contact our Head of Risk and Regulatory at [dataprotection@clarionsolicitors.com](mailto:dataprotection@clarionsolicitors.com).

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Clarion is the trading name of Clarion Solicitors Limited incorporated and registered in England and Wales with company number 7185479 whose registered office is Elizabeth House, 13-19 Queen Street, Leeds, LS1 2TW.