

Privacy Policy for Clients

This privacy policy applies to personal data we process about our clients. We have a separate privacy policy that applies to personal data we process about our suppliers and other external contacts.

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 (together referred to as the “**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, your date of birth and personal data we have obtained for identification purposes (such as passport images and utility bills).

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 data 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.

2 The Personal Data we Collect about you

2.1 We may process the following types of personal data about you:

2.1.1 Identity Data

such as your full name, marital status, title, date of birth, gender, signature, ID documentation and information required for us to conduct anti-money laundering checks at the start of our engagement with you;

2.1.2 Contact Data

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

2.1.3 Financial Data

such as your bank account details where we are transferring funds to your personal account or any card details where you pay any invoices by way of card payment;

2.1.4 Matter Data

including any personal data relating to you that is processed during the course of progressing any matter we are engaged to act on or to respond to any enquiry raised by you. This includes personal data that we store as a result of your use of DocuSign software as set out in more detail below;

2.1.5 Marketing Preferences

which includes details of which types of marketing you would like to receive from us;

2.1.6 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;

2.1.7 Special Categories of Personal Data

certain categories of data are considered "special categories of data" and are subject to additional safeguards. The special categories of personal data which we process may relate to: Racial or ethnic origin; Genetic and/or biometric data; Political opinions; Religious or philosophical beliefs; Trade union membership; Physical and mental health and/or Sex life and/or sexual orientation;

2.1.8 Other Data

required to facilitate any meetings or events you attend at our offices including, but not limited to, any dietary information (which may indirectly reveal religious preferences or medical/health information) and your vehicle registration number.

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 the services we may provide to you.

3 DocuSign

3.1 If you use DocuSign software to electronically sign documents produced by Clarion, we will process the following information:

3.1.1 consents to use an e-signature;

3.1.2 the signed, exchanged and completed documents that have been processed using DocuSign;

3.1.3 the e-signatures;

3.1.4 full names;

3.1.5 email addresses;

3.1.6 telephone/mobile phone numbers;

3.1.7 computer IP addresses/locations of signing; and

3.1.8 times and dates that documents were signed.

3.2 Such information is processed on the grounds our legitimate interests in providing our clients and other relevant parties with the ability to electronically sign documents. For more information on how DocuSign works, please contact us.

4 Artificial Intelligence (AI)

4.1 We are committed to providing excellent and innovative client service, 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.

4.2 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.

- 4.3 If you would like more information about the AI solutions we are using or trialling, please contact us at dataprotection@clarionsolicitors.com or speak to your Clarion relationship manager or contact.

5 How we Collect your Personal Data

- 5.1 We collect most of your personal data directly from you. We may also however collect information from other sources including:

- 5.1.1 publicly accessible sources such as Companies House or HM Land Registry;
- 5.1.2 third parties such as client due diligence and screening providers which use credit reference agencies to provide information. There are 3 main credit reference agencies in the UK regulated by the Financial Conduct Authority (Experian, Equifax and TransUnion). These credit reference agencies publish a Credit Reference Agency Information Notice which explains how they obtain, process and share personal data about consumers and businesses. The notice published on Experian's website can be viewed here [Credit Reference Agency Information Notice \(CRAIN\) | Experian](#);
- 5.1.3 legal advisors who are instructed to work on your matter (e.g. solicitors that are advising a third party with whom you may be opposing in litigation);
- 5.1.4 other organisations and individuals that are involved in your case or file; and
- 5.1.5 third parties such as your bank or building society or another advisor, consultants or other professionals we engage with in relation to your matter, your employer or trade union, professional body or pension administrators, and/or your doctors, medical and occupational health professionals.

6 Why do we Process your Personal Data?

- 6.1 We process your personal data in order to provide you with the advice and services you have requested, whether pursuant to a formal engagement between us or in order to provide you with initial information to enable you to decide whether you wish to instruct us. If we do not receive the personal data we need from you we may be unable to act for you or provide you with the information and/or advice you have requested.
- 6.2 We process most of your information on one of the following grounds:
- 6.2.1 our legitimate interests in providing you with the advice or services you have requested and continuing and developing our relationship with you;
 - 6.2.2 where you are an individual client as opposed to a business client, fulfilment of our contract with you or to taking steps with a view to entering into a contract with you;
 - 6.2.3 to comply with our legal or regulatory obligations, such as our legal obligations in relation to anti-money laundering laws and regulations. This may include where we also have a recognised legitimate interest when sharing data with public bodies where the processing of personal data is necessary for the purposes of preventing crime;
 - 6.2.4 where this is necessary to protect your vital interests, or someone else's vital interests (typically in an emergency) or where we may have a recognised legitimate interest when sharing data with public bodies where the processing of personal data is necessary for the purposes of safeguarding a vulnerable individual; or

- 6.2.5 in respect of the processing of special categories of personal data:
- 6.2.5.1 where the processing is necessary for the establishment, exercise or defence of legal claims;
 - 6.2.5.2 where the processing is necessary for reasons of substantial public interest such as for the prevention or detection of an unlawful act or for preventing fraud or where we may also have a recognised legitimate interest to process data in that respect; or
 - 6.2.5.3 where the processing relates to personal data which is manifestly made public by you.
- 6.3 In addition to the above, there may be occasions where we process personal data relating to criminal convictions and offences. We process criminal offence data where necessary in relation to legal claims, to prevent or detect unlawful acts, to comply with regulatory requirements relating to unlawful acts and dishonesty and to prevent fraud / money laundering.

6.4 Finally, we may use your personal data to improve our services, for example to test the improvements of a system(s) or development of a new system(s) in pursuit of our legitimate business interests. In those cases, will endeavour to use dummy or anonymised data wherever possible. Where that is not possible, we will ensure that your data is used in a safe and controlled manner in accordance with our obligations under Data Protection Legislation.

7 Cookies

7.1 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.

8 Who will Receive your Personal Data?

- 8.1 We only transfer your personal data to the extent we need to. Recipients of your personal data may include but are not limited to:
- 8.1.1 third party suppliers of archive and storage services;
 - 8.1.2 third party IT services providers, including those who operate our case management system, website and other systems or applications;
 - 8.1.3 our data centre;
 - 8.1.4 our insurers;
 - 8.1.5 our bank;
 - 8.1.6 consultants who provide services to you on our behalf including consultants of Clarion Advisory LLP (an associated entity providing legal services to Clarion via its members);
 - 8.1.7 other professionals to whom you have asked us to refer you to (including accountants and other professional legal advisers such as barristers);
 - 8.1.8 legal advisors who are instructed to work on your matter (e.g. solicitors that are advising a third party with whom you may be opposing in litigation);
 - 8.1.9 courts and any other official bodies, including law enforcement agencies;

- 8.1.10 Companies House where we are required to pass information about you in your capacity as a director or shareholder for the purposes of the services we are providing to you;
 - 8.1.11 third party providers of email marketing and other marketing platforms; and
 - 8.1.12 third party providers of anti-money laundering services and credit reference checks.
- 8.2 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 your 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.

9 How we keep your Personal Data secure

- 9.1 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.
- 9.2 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.

10 How long will we keep your Personal Data?

- 10.1 The period for which we will retain your data will depend on the following factors:
- 10.1.1 the type of work we provide to you;
 - 10.1.2 our insurance requirements;
 - 10.1.3 requirements placed on us by the Solicitors Regulation Authority; and
 - 10.1.4 statutory requirements to retain your personal data.
- 10.2 We will keep your personal data for a least 7 years from the end of your retainer with us/your matter has been closed, or from our last contact 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.
- 10.3 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.
- 10.4 We retain CCTV footage for a period of 3 weeks after which it is permanently deleted unless it is relevant to a crime, incident or other event that has arisen in which case we will retain it for as long as required in relation to such crime, incident or event.
- 10.5 To the extent we process your personal data as a result of your use of DocuSign software, we will retain your data for the period we deem necessary based on the type of document that has been signed electronically using the software. We take into account a number of factors, including but not limited to the period in which an issue or query may arise or a claim may be brought in relation to the document.
- 10.6 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 or your Clarion relationship manager or contact.
- 10.7 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.

11 What are your Rights?

- 11.1 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.
- 11.2 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.
- 11.3 If you wish to exercise any of your rights, please contact 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.
- 11.4 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](#)).

12 Your Right to Complain about our Processing

- 12.1 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. 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.
- 12.2 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.
- 12.3 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

13 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.

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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.