

DATA PROTECTION PRIVACY NOTICE (WEBSITE)

Lanyon Bowdler takes the privacy of your information very seriously. This notice explains how and for what purposes we use the information collected about you via www.lblaw.co.uk (referred to below as the “Site”), some of which may be collected from your computer or other device which you may use to access the Site (referred to below as a “Device”). By using the Site and any services we offer via the Site, you are agreeing to be bound by this notice in respect of the information collected about you via the Site. Please ensure that you read this notice (sometimes referred to as a ‘privacy notice’) and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

1. WHO COLLECTS THE INFORMATION?

Lanyon Bowdler LLP (referred to as “we”, “us” or “our” in this privacy notice) is a ‘data controller’ and gathers and uses certain information about you. We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

We use Moneypenny’s Live Chat service. Moneypenny is a registered trademark of Callitech Limited. Under UK GDPR Moneypenny is a ‘data controller’ and applies the same principles as set out below.

2. DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information.

3. ABOUT THE INFORMATION WE COLLECT AND HOLD AND HOW WE COLLECT IT

Personal data 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.

- We may collect the following details from you whenever you complete a form online or sign up to the “Call me back” service:
 - Full name;
 - Email address;
 - Telephone number and mobile number;
 - Which of our offices is closest to where you live;
 - The nature of your query;

- The source from which you obtained information about Lanyon Bowdler.
- If you request a quote for a residential property matter we will collect the following information:
 - Type of transaction (sale, purchase etc)
 - Location of property
 - The price you are buying or selling for
 - Type of ownership
- If you request information about our employment services for employers we may also collect the following information:
 - Business type
 - Turnover
 - Number of employees
 - Annual payroll figure
 - Details of any tribunal claims
- If using our Live Chat service, hosted by Money Penny, you will be asked for various personal information including contact details and a brief summary of your enquiry.
- When you visit the Site our web server automatically records your IP address.
- When you visit the Site we may store some information (commonly known as a “cookie”) on your Device. Cookies are small text files that a website transfers to the hard drive on your Device to store and sometimes track information about you. Cookies are specific to the server that created them and cannot be accessed by other servers, which means that they cannot be used to track your movements around the web. Passwords and credit card numbers are not stored in cookies. A cookie helps you get the best out of the Site and helps us to provide you with a more customised service. We use persistent cookies (also known as “tracking cookies”) on the Site which collect information about how you use our Site. These cookies are stored on your Device between browsing sessions. They enable us to recognise you on your return, to remember your preferences and to tailor services to you.

- We may also gather other non-personal information (from which we cannot identify you) such as the type of your internet browser which we use to provide you with a more effective service.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Although it is not compulsory to give us the personal data set out above, if you do not then we may not be able to provide you with the full range of services the Site has to offer.

You can block or erase cookies from your Device if you want to (your browser's help screen or manual should tell you how to do this), but certain parts of the Site are reliant on the use of cookies to operate and may not work correctly if you set your browser not to accept cookies. More information about cookies, including how to block them or delete them, can be found at www.AboutCookies.org.

4. HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
Processing requests for services submitted by you	For the performance of our contract with you or to take steps at your request before entering into a contract
Carrying out marketing analysis and making general improvements to the Site	For our legitimate interests i.e. to enable us better to promote our services, and enhance and improve the Site
Tracking how our Site is used and to improve and update our content and better target our marketing and advertising campaigns	For our legitimate interests i.e. to enable us better to promote our services, and enhance and improve the Site
Customising the Site and its content to your particular preferences and to make your use of the site more efficient	For our legitimate interests i.e. to enable us better to promote our services, and enhance and improve the Site
Sending you information about our services	For our legitimate interests i.e. to promote our business and the services we provide
Notifying you of any changes to the Site and services which may affect you	For our legitimate interests i.e. to enable us better to promote our services, and enhance and improve the Site

5. **GOOGLE ANALYTICS**

We use Google Analytics which uses cookies to help us analyse how you use the Site. Google Analytics is a web analytics service provided by Google LLC who are based in the USA. As a result, information generated by the cookie about your use of our Site (including your IP address) will be transmitted to and stored by Google on servers in the USA. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google undertakes not to associate your IP address with any other data held by Google.

Google Analytics counts the number of visitors and tells us things about their behaviour overall. The cookies collect information in an anonymous form, including the number of visitors to the Site, where they came from and the pages they visited. We use the information to compile reports and help us improve the Site.

More information about Google's privacy policy can be found at https://privacy.google.com/businesses/compliance/#?modal_active=none

6. **DISCLOSURES OF YOUR PERSONAL DATA**

6.1 We will only disclose your Personal Information without your permission in the following circumstances:

6.1.1 If we are required by law to do so (for example, if required to do so by a court order, the government or other law enforcement agencies or for the purposes of investigation and/or prevention of fraud or other crime or where it is necessary for the purpose of, or in connection with, legal proceedings or in order to exercise or defend legal rights.

6.1.2 If you accept an invitation to an event or promotional activity run by us in connection with trusted professional third parties, and your name is included on an attendee list which is shared with the third parties or other guests. If this arises, any third parties will only have access to the names of the attendees. Contact details and other Personal Information will not be shared or disclosed to any third parties, co-hosts or other guests without your agreement.

6.1.3 If you use our translation service, the translation is provided by a third party translation company, who will take the information from you and share it with us.

6.1.4 Service providers who provide IT and system administration services to us may have access to the data in the course of providing their services to us.

6.1.5 In the ordinary course of using Google Analytics (as described above)

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 our third-party service providers who are data processors 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.

7. INTERNATIONAL TRANSFERS OF INFORMATION

Apart from our use of Google Analytics (as described above) we do not ordinarily transfer your personal data outside the UK

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK where:

1. the UK government has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
2. there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
3. a specific exception applies under data protection law

These are explained below.

(a) Adequacy decision

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:

1. all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
2. Gibraltar; and
3. Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.

The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

(b) Transfers with appropriate safeguards

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using legally-approved standard data protection contract clauses. In relation to transfers between offices or other companies within a group, the safeguards may instead include legally binding rules and policies (known as binding corporate rules), which have been approved by the UK data protection regulator.

(c) Transfers under an exception

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under data protection law, e.g.:

1. you have explicitly consented to the proposed transfer after having been informed of the possible risks;
2. the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
3. the transfer is necessary for a contract in your interests, between us and another person; or
4. the transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

8. WHERE INFORMATION MAY BE HELD

Information may be held at our offices and those of third party agencies, service providers, representatives and agents as described above. Information may be transferred internationally to other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above.

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security 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 WE KEEP YOUR INFORMATION

We keep your information during and after your custom with us for no longer than is necessary for the purposes for which the personal information is processed, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements. Further details on this are available in our Data Retention Schedule which you can request from us by contacting our Managing Partner (details below)

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

10. YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED

Your rights in connection with personal information

10.1 Under certain circumstances, by law you have the right to:

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

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact in writing, by email or telephone using the details shown in paragraph 12 below.

No fee usually required

- 10.2 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

10.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure we take to ensure that personal information is not disclosed to any person who has no right to receive it.

11. 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.

12. THIRD PARTY WEBSITES

We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from the Site and recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

In addition, if you linked to the Site from a third party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

13. CONTACTS & COMPLAINTS

If you have any questions about how we treat and protect your personal data and your privacy, if you have any comments, wish to seek to exercise any of your rights as outlined above or to complain, please contact our Managing Partner at Chapter House North, Abbey Lawn, Shrewsbury, SY2 5DE, by telephone on 01743 280287 or by email (brian.evans@lblaw.co.uk).

We hope that we can resolve any query or concern you raise about our use of your information. If not, you may contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.