

## **WILSON WARD LLP PRIVACY POLICY**

This privacy policy sets out how Wilson Ward LLP, Solicitors of 131 Newhaven Road, Edinburgh EH6 4NP uses and protects personal information that our clients and third parties provide to us.

We are committed to ensuring that our clients' information and privacy is protected in accordance with all of our legal obligations. You can be assured that your personal information will only be used in accordance with this policy.

**This Policy is effective from 19<sup>th</sup> June 2019**

### **What we need**

Wilson Ward LLP will be a "controller" of the personal information that you provide to us when you instruct us to act on your behalf unless otherwise stated in this privacy notice.

When you become a client of Wilson Ward LLP we will collect, store and use the personal information that you provide to us in your instructions and during the course of our solicitor / client relationship. We may ask you for additional personal information during the course of our client / solicitor relationship, which shall be collected, stored and used in accordance with this privacy policy.

We may also collect, store and use the following personal information relating to you when you become our client from Third Parties including personal searchers to establish any impediments to completing a transaction; Third Party agencies as an additional check to comply with Anti Money Laundering requirements.

### **Why we need your personal information – contractual purposes**

We need to collect your personal information so that we can perform our agreement with you. We will use your personal information to:

- provide you with legal advice, including by communicating with you by email, letter and/or telephone, etc.;
- represent you as your solicitors in connection with all your legal requirements for which you have instructed us to act;
- respond to and communicate with you regarding your questions, comments, support needs or complaints, concerns or allegations in relation to the work which you have instructed and being provided by Wilson Ward; and
- Administrative, financial, regulatory and business development purposes.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to provide you with legal advice and / or represent you as your solicitors.

### **Why we need your personal information – legitimate purposes**

*Individual clients' personal data:*

We also process our clients' personal information in pursuit of our legitimate interests to:

- promote our services by sending clients communications with information for upcoming events, offers and legal updates;
- invite our clients as guests to our events;
- use transactional data in the purpose of future marketing (ie promotional material being distributed after the sale of your property which may include the address)

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on 0131 467 7550 or by e-mail [peter@wilsonward.co.uk](mailto:peter@wilsonward.co.uk) or at our offices at 131 Newhaven Road, Edinburgh. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a client.

### **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our clients for the purposes of complying with our obligations under:

- the Law Society of Scotland requirements for solicitors;
- Anti Money Laundering Requirements;
- Compliance with our legal, regulatory and corporate governance obligations and good practice. Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests and investigating complaints.

We may also share personal data with our professional advisors for the purposes of taking advice.

Wilson Ward LLP employs third party suppliers to provide services, including IT and utilising the services of credit reference agencies including but not limited to; Equifax (<https://www.equifax.co.uk/ein.html>); Transunion (<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>). These suppliers may process personal data on our behalf as "processors" and are subject to conditions to only process that personal data under our instructions and protect it.

In the event that we do share personal data with external third parties, we will only share such personal data strictly required for the specific purposes specified and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

### **How we protect your personal information**

Your personal information is stored on our electronic filing system and our servers based in the UK/EU and are accessed by our staff for the purposes set out above.

If we are required to transfer your personal information outwith the EU we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

## **How long we keep your personal information**

We keep our clients' personal data for the recommended period required to comply with various Law Society, Anti Money Laundering and other regulations. We will review and possibly delete your personal information following a period of at least 5 years after you have ceased to be our client.

We have different data retention policies for different types of work that sets out the periods for retaining and reviewing all information that we hold. You can request a copy by contacting us at 131 Newhaven Road, Edinburgh EH6 4NU; 0131 467 7550 : [peter@wilsonward.co.uk](mailto:peter@wilsonward.co.uk) .

## **Your rights**

You can exercise any of the following rights by writing to us at Wilson Ward LLP, 131 Newhaven Road, Edinburgh EH6 4NU or [peter@wilsonward.co.uk](mailto:peter@wilsonward.co.uk) .

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.
- Our data protection privacy policy can be viewed on our website.

Any requests received by Wilson Ward LLP will be considered under applicable data protection legislation.

If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)