

VERMEYLEN LAW

**Privacy Policy**

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

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 are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to services we offer to individuals in the European Economic Area (EEA).

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Vermeyley Law Limited (trading name Vermeyley Law)
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership  Genetic and biometric data (when processed to uniquely identify an individual)  Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

### Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of providing legal services.

Personal data we will collect	Personal data we may collect depending on why you have instructed us
Your name, address and telephone number	Your National Insurance and tax details
Information to enable us to check and verify your identity, eg your date of birth or passport details	Your bank and/or building society details
Electronic contact details, eg your email address and mobile phone number	Details of your professional online presence, eg LinkedIn profile
Information relating to the matter in which you are seeking our advice or representation	Details of your spouse/partner and dependants or other family members, including eg if you instruct us on a Lasting Powers of Attorney, Court of Protection matter, and / or Will matter
Information to enable us to undertake a credit or other financial checks on	Your employment status and details including salary and benefits, eg if you instruct us on a Lasting Power of Attorney or Will matter
	Your nationality and immigration status and information from

Personal data we will collect	Personal data we may collect depending on why you have instructed us
<p>you</p> <p>Your financial details so far as relevant to your instructions, eg the source of your funds if you are instructing on a purchase transaction</p> <p>Information about your use of our IT, communication and other systems, and other monitoring information</p>	<p>related documents, such as your passport or other identification, and immigration information, eg if you instruct us on a Will or inheritance tax matter</p> <p>Details of your pension arrangements, eg if you instruct us on a Lasting Powers of Attorney, Will, or inheritance tax matter</p> <p>Your medical records, eg if we are acting for you in a matter where your medical records may be relevant eg a Will, Lasting Powers of Attorney or probate matter</p> <p>Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances, eg in which your employment records are relevant such as relating to a Will, inheritance tax, or probate matter</p>

This personal data is required to enable us to provide legal services. If you do not provide personal data we ask for, it may delay or prevent us from providing those services.

### How your personal data is collected

We collect most of this information from you direct. However, we may also collect information:

- from publicly accessible sources, eg Companies House or HM Land Registry;
- directly from a third party, eg:
  - sanctions screening providers;
  - credit reference agencies; and / or
  - client due diligence providers.
- from a third party with your consent, eg:
  - your bank or building society, another financial institution or advisor;
  - consultants and other professionals we may engage in relation to your matter;
  - your employer and/or trade union, professional body or pension administrators; and / or
  - your doctors, medical and occupational health professionals.

- via our website—we use cookies on our website (for more information on cookies, please see our Cookies Policy);
- via our information technology (IT) systems, eg:
  - case management, document management and time recording systems;
  - from door entry systems and reception logs; and / or
  - through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

### How and why we use personal data

Under data protection law, we can only use personal data if we have a proper reason, eg:

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

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains how we use personal data and our reasons for doing so:

<b>What we use personal data for</b>	<b>Our reasons</b>
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, ie to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our clients and verify their identity  Screening for financial and other sanctions or embargoes  Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety law or rules issued by our professional regulator	To comply with our legal and regulatory obligations

<b>What we use personal data for</b>	<b>Our reasons</b>
To enforce legal rights or defend or undertake legal proceedings	<p>Depending on the circumstances:</p> <p>—to comply with our legal and regulatory obligations;</p> <p>—in other cases, for our legitimate interests, ie to protect our business, interests and rights</p>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>Depending on the circumstances:</p> <p>—for our legitimate interests, ie to protect trade secrets and other commercially valuable information;</p> <p>—to comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, eg in relation to our financial performance, client base, services range or other efficiency measures	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	<p>Depending on the circumstances:</p> <p>—for our legitimate interests, ie to prevent and detect criminal activity that could be damaging for you and/or us;</p> <p>—to comply with our legal and regulatory obligations</p>
Protecting the security of systems and data used to provide services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes</p>

What we use personal data for	Our reasons
	beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Updating and enhancing client records	Depending on the circumstances: <ul style="list-style-type: none"> <li>—to perform our contract with you or to take steps at your request before entering into a contract;</li> <li>—to comply with our legal and regulatory obligations;</li> <li>—for our legitimate interests, eg making sure we can keep in touch with our clients about existing and new services</li> </ul>
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: <ul style="list-style-type: none"> <li>—to comply with our legal and regulatory obligations;</li> <li>—for our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</li> </ul>

### How and why we use special category personal data

Certain personal data we collect is treated as a special category to which additional protections apply under data protection law.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

### How and why we use your personal data—sharing

See 'Who we share your personal data with' for more information on the steps we will take to protect your personal data where we need to share it with others.

## Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us by email at [support@vermeylen-law.com](mailto:support@vermeylen-law.com)
- using the 'unsubscribe' link in emails or 'STOP' number in texts

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

## Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services to you, eg payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- credit reference agencies;
- our insurers and brokers;
- our bank;
- professional advisers who we instruct on your behalf or refer you to, eg barristers, medical professionals, accountants, tax advisors or other experts;
- other third parties where necessary to carry out your instructions, eg HM Land Registry or Companies House;
- external auditors, eg in relation to the audit of our accounts;
- external service suppliers, representatives and agents that we use to make our business more efficient, eg tax professionals, accountants, typing services, marketing agencies, document collation or analysis suppliers.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, eg in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisors) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations

### **Who we share your personal data with—further information**

If you would like more information about who we share our data with and why, please contact us (see **'How to contact us'** below).

### **Where your personal data is held**

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see **'Who we share your personal data with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: **'Transferring your personal data out of the UK and EEA'**.

### **How long your personal data will be kept**

We will not keep your personal data for longer than we need it for the purpose for which it is used.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

### **Transferring your personal data out of the UK and EEA**

The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

As we are based in the UK we will also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an **'adequacy regulation'**) further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#) .
- EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an **'adequacy decision'**) further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#) .
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on **'Changes to this privacy policy'** below.

### **Transferring your personal data out of the UK and EEA—further information**

If you would like further information about data transferred outside the UK/EEA, please contact (see **'How to contact us'** below).

### **Your rights**

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain situations, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations

To object	<p>The right to object:</p> <p>—at any time to your personal data being processed for direct marketing (including profiling);</p> <p>—in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims.</p>
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For more information on each of those rights, including the circumstances in which they apply, please contact us (see **'How to contact us'** below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#) .

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: **'How to contact us'**; and
- provide enough information to identify yourself (eg your full name, address and client or matter reference number) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

### Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it.

We also have procedures 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.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org) . Get Safe Online is supported by HM Government and leading businesses.

## How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK; and
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA.

The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint>  or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [here](#) .

## Changes to this privacy policy

This **privacy policy** was published last updated on 11<sup>th</sup> July 2022.

We may change this privacy policy from time to time, when we do we will publish the updated version on our website: [www.vermeylen-law.com/legal-and-regulatory-information](http://www.vermeylen-law.com/legal-and-regulatory-information).

## How to contact us

### Individuals in the UK

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

<b>Our contact details</b>	
Address	40 Berkeley Square Bristol BS8 1HP
Email address	support@vermeylen-law.com
Telephone	0117 251 0175

### **Individuals in the EEA**

Individuals within the EEA can contact us direct (see above).

### **Do you need extra help?**

If you would like this policy in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).