

# GREENE & GREENE

SOLICITORS

## PRIVACY NOTICE

Greene & Greene respects your privacy and is committed to protecting your personal data. This privacy notice will inform you how we look after your personal data if you are:

- a current, potential or former client,
- a supplier, or professional or business contact of Greene & Greene,
- a visitor to our website ([www.greene-greene.com](http://www.greene-greene.com)),

and otherwise when we interact with you.

We may update this privacy policy from time to time – you can find our latest policy on our website at [www.greene-greene.com/privacy](http://www.greene-greene.com/privacy) or by asking us for a copy.

### 1. IMPORTANT INFORMATION

Greene & Greene is the data controller and responsible for your personal data (collectively referred to as "G&G", "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Manager as follows:

Address: 80 Guildhall Street, Bury St Edmunds, Suffolk, IP33 1QB

Telephone Number: 01284 762211

Email address: [privacy@greene-greene.com](mailto:privacy@greene-greene.com)

#### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT AND HOW WE COLLECT IT

### The data we collect

Depending on your relationship with us (for instance, whether you are a client or professional contact), we collect, use, store and transfer some or all of the following data:

- **Identity and Contact Data:** personal and identity data, including your names, date of birth, information about your family, copies of your passport driving licence and other ID, national insurance number, postal address, email address and telephone numbers;
- **Financial Data:** including details of your bank accounts and payment card details;
- **Client Data:** all of the personal data that you may give to us in connection with the advice we provide to you, including details about your income and tax affairs, financial affairs, family details, property ownership, personal affairs, medical and health information, details about your business and business transactions;
- **Transaction Data:** details of services we provide to you;
- **Technical Data:** information we collect automatically when you visit our website, including your IP address, browser details, and device details;
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and your communication preferences.
- **Sensitive Data:** includes data about your health and medical conditions, and also your temperature where we conduct temperature checks.

### Can you withhold your data?

You can withhold your data from us if you wish. But where we need to collect personal data by law, or to provide services to you, and you fail to provide that data when requested, we may not be able to provide our services to you. In such cases, we may have to suspend or terminate our engagement, but if this is the case, we will notify you at the time.

### Sensitive Data

We may also collect, store and use information about your health, including any medical condition, health and sickness records, and medical records and reports, as part of providing services to you, which is particularly sensitive data.

### Measures to protect against the spread of coronavirus

During the coronavirus pandemic, we may ask those attending our office to undergo a temperature check on arrival. This will be carried out by a member of our reception team using a contactless thermometer. We will not make any record of the result, but if your temperature is recorded as “High” then we will ask you to leave our office, and to arrange a telephone appointment or re-arrange for another day.

Those attending our office may also “sign in” using the NHS Test and Trace QR code displayed in the vicinity of our reception area.

## Where we collect your data from

We may collect your data from different sources:

- We collect all of the types data listed above directly from you when you interact with us.
- We collect Identity and Contact Data, Financial Data, and Client Data from your relatives where we interact with them directly when providing our services, and from any joint-clients who you jointly instruct us with.
- We collect Identity and Contact Data, Financial Data, and Client Data from professionals and others providing you with services, such as your accountant, financial advisor, mortgage advisor, other legal advisors, or bank.
- We collect Technical Data automatically when you interact with our website, by using cookies and other similar technologies.
- We collect Identity and Contact Data from online reference agencies for the purposes of verifying your identity as our client.
- We collect Identity and Contact Data, and some Client Data, from publicly available records such as Companies House and the Land Registry.

### 3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us using the details above if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new client	Performance of a contract with you
To carry out identity checks on you as a new client or person sending funds to us.	Necessary to comply with a legal obligation
To provide services to you and carry out your instructions in connection with our services	Performance of a contract with you
To share information with your other professional advisors for the purposes of them providing services to you	(a) Performance of a contract with you (b) Consent, where you have provided consent to us sharing this information
To communicate with you for the purpose	Necessary for our legitimate interests (to provide

of providing services to our clients, who may be mutual clients	services to our clients in an efficient manner).
To carry out administration in connection with the provision of services to you, including: (a) Managing payments, fees and charges (b) Collect and recover money owed to us	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage queries relating to services we have provided to you historically	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to be able to respond to queries about our services)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a competition or complete a survey	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Consent (where you have provided positive consent) (b) Necessary for our legitimate interests (to develop our products/services and grow our business)
To invite you to networking and professional events, and to inform you about developments in our business or the	(a) Consent (where you have provided positive consent) (b) Necessary for our legitimate interests (to develop

law more generally.	our products/services and grow our business).
Where we are required to send information to our regulators, including: (a) notifying the regulators about matters of professional conduct; (b) when you click on a link from our website to our regulators (such as the SRA authentication badge)	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to comply with our regulatory obligations)
(a) To provide information to NHS Test and Trace on those attending our office. (b) To take the temperature of those attending our office.	(a) Consent (where you voluntarily sign in using a QR Code) (b) Necessary for our legitimate interests (to help protect our clients and staff from the spread of coronavirus; to comply with requests from public bodies)

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

In addition, we may process your personal data without your knowledge or consent, where this is required or permitted by law.

### **Sensitive Data**

Where we hold particularly sensitive data, such as your medical information, we will only use this for the purpose of providing our services to you. Please also refer to the section above on “Measures to protect against the spread of coronavirus”.

### **Marketing**

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and events may be relevant for you.

You may receive marketing communications from us in respect of our business and our services if you have requested information from us or previously been a client of G&G and, in each case, you have not opted out of receiving that marketing.

We do not share your contact details with any third party for the purpose of that third party sending marketing.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us using the details above at any time.

### **Anti-Money Laundering and Fraud Prevention**

We are required by law and our regulators to carry out checks on the identity and address of all of our clients, and certain others who send us funds. As part of carrying out those checks, we may pass your details to third party search providers.

We may also be required by law to provide your personal data to crime or fraud prevention agencies.

### **Aggregated Data and Benchmarking**

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. For example, we may prepare statistics on the level of donations to charity left by clients in their wills. Although aggregated data may be derived from your personal data, it is not considered personal data in law as this data does not directly or indirectly reveal your identity.

### **Cookies when using our website**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [www.greene-greene.com/cookies.html](http://www.greene-greene.com/cookies.html)

When you click through to other websites from our site (including by visiting the SRA website by clicking on the SRA badge on our website), those websites may place cookies on your device or collect data from you. We are not responsible for the activities of the provider of any third party website.

## **4. DISCLOSURES OF YOUR PERSONAL INFORMATION**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3 above:

- **Your professional advisers** including barristers, accountants, financial advisors, bankers, insurers who may be based in the EEA or may be based outside of the EEA.
- **Third parties who we may interact with on your behalf or in connection with providing our services** including other solicitors, courts, banks and lenders, regulatory bodies such as the Financial Conduct Authority, HMRC, CAF/CASS, the Probate Registry, the Land Registry, medical experts, expert witnesses, and other parties who contract with, or engage with, you.
- **Search providers** who carry out checks on your identity.
- **Service providers** based within the UK or wider EEA who provide IT and system administration services, or who store documents on our behalf.
- **Our professional advisers** including lawyers, bankers, auditors and insurers based in the UK or EEA who provide consultancy, banking, legal, insurance and accounting services.
- **HM Revenue & Customs, the Solicitors Regulation Authority (SRA),** crime prevention agencies, and other authorities based in the UK who require reporting of our processing activities in certain circumstances. If you click through to the SRA website using the SRA badge on our website, you may also transfer data (such as your IP address) to the SRA.
- **Company administrators and liquidators;**
- **Third parties** to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

- **To NHS Test and Trace**

We do not allow our third-party service providers 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.

## 5. **INTERNATIONAL TRANSFERS**

We may transfer your personal data to third parties providing services to us who are based outside of the European Economic Area (EEA). This includes parties providing IT administration services and hosting services, and parties providing assistance with managing our marketing databases.

Whenever we transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Transferring data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- using specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or
- for providers based in the US, we may transfer data to them if they are part of the Privacy Shield.

## 6. **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, 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.

For more details of our specific retention periods, please contact our Data Protection Manager.

## 7. **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are set out below. If you wish to exercise any of the rights set out above, please contact our Data Protection Manager.

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

## Complaint to the ICO

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Your legal rights

Your legal rights are as follows:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in certain circumstances.
- **Request the transfer** of your personal data to you or to a third 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.