

PRIVACY POLICY

Howard & Co are committed to protecting the personal information you provide or we collect when you use any of our services.

We collect and use different information depending on the ways in which you interact with us. This Privacy Policy explains how we use that information, and in particular the following:

- TYPES OF INFORMATION WE MAY COLLECT ABOUT YOU
- HOW WE LOOK AFTER YOUR INFORMATION
- HOW AND WHY WE USE YOUR INFORMATION
- WHO WE SHARE YOUR INFORMATION WITH
- HOW LONG WE HOLD INFORMATION FOR
- YOUR RIGHTS
- HOW TO CONTACT US

You can click on any of the links above to find out more.

This privacy policy applies to Howard & Co as the “data controller” responsible for your personal information. This policy may be updated, to keep up with legal and/or business developments, so you should check it from time to time. The date of the most recent change to each section of the policy will appear at the bottom of the relevant page.

TYPES OF INFORMATION WE MAY COLLECT ABOUT YOU

When you give instructions to us to use our services we may collect personal information about you. Different services may require different types of information.

Here is some specific detail about the information we collect:

- Information you give to us when requesting our services (including information given when you ask us to quote for costs in a potential matter). This will normally include information about yourself (such as your name, date of birth, NI number etc) and contact details (such as address, email address, telephone number etc);
- Information about your transaction(s); we will make a record of the details of that/those transaction(s), including what services you have used and details of the payment made; and
- Contact information: if you contact us, we may keep a record of that correspondence.

If you fail to provide the personal information we have requested where we are required to collect this by law and/or to perform our contract with you, we may be unable to perform the contract we have or that we are trying to enter into with you.

Updated 23/04/2019

HOW WE LOOK AFTER YOUR INFORMATION

What do we do to make sure that your data is safe and used only for the purposes it was collected for?

We are committed to protecting your personal information and we have appropriate procedures and security features in place to keep it secure and to prevent unauthorised access.

Unfortunately transmission of information via the internet is not completely secure. Although we do our best to protect your information, we cannot guarantee its security and when giving us your information, you do so at your own risk.

The information that we collect from you may be transferred to, stored at or accessed from a destination outside the European Economic Area (which consists of the EU, Iceland, Norway & Lichtenstein) by us (or by someone acting on our behalf) where it is necessary to fulfil our contract with you, process payment details or provide you with other services. Where this is the case we will always ensure that appropriate protection is in place to protect your personal information.

HOW AND WHY WE USE YOUR INFORMATION

We may use your information for a number of purposes, depending on how and where we receive it. We will always do so on a lawful basis, which will normally be one of the following justifications:

1. To perform our contract with you.

In nearly all circumstances we will need to use your information to help us provide you with the contract you have entered into with us and to enable us to provide our services to you. For example, we will do this:

- To process payments and any other request that you make of us;
- To enable other people or businesses to carry out work on our behalf.

2. Legal Obligation.

We are entitled to process your personal information where we are under a legal or regulatory obligation to do so.

3. Legitimate interests.

Sometimes we will use your information for specific purposes that we have carefully considered, taking into account any potential impact on you and your rights, where it will help us to enhance the services we provide and benefit our clients. This may include:

- to keep our records up to date, including any correspondence or communications between us;
- to administer and protect our business and websites (including troubleshooting, system maintenance, testing, reporting etc);
- for management and auditing of our business;

- to investigate and protect against fraudulent, unauthorised or illegal activity; and
- to provide your information to buyers in the event of a sale or potential sale of Howard & Co (or any of our assets) to a third party.

Where we process your information based on legitimate interest grounds, you may object to this at any time and we will stop using it for that purpose, unless we have compelling legitimate grounds or other legal reason for continuing to use it. Please see “What rights do I have” for further information.

WHO WE SHARE YOUR INFORMATION WITH

Generally we will only use your information to provide you with our services you have requested. We will also disclose your information to third parties where we have a legal obligation or justification for doing so (see “How and why we use your information”). This may include:

- with a third party who is helping us to provide a service to you, such as payment processors and/or out IT and database support services; and
- when the disclosure is required or permitted by law (e.g.to government bodies and law enforcement agencies).

Where we share personal information with a third party, we require them to respect the security of your personal data and to treat it in accordance with the law. We do not give them permission to use that information outside of their contract with us.

Similarly, our services may contain links to websites or apps that are owned and operated by other organisations, and which have their own personal privacy policies that govern their collection and use of your personal information. Your use of such websites is therefore at your own risk.

Where we pass personal information to a third party acting on our behalf, in addition to the measures set out above, we also require them to treat this information with at least the same protection that we do. We only permit them to process your personal data for specified purposes and in accordance with our instructions. We do not share more information with them than is necessary for the relevant purpose.

HOW LONG WE HOLD INFORMATION FOR

We collect all personal information for one or more specific purpose (see “How and why we use your information”). This means that we hold your information on our systems as long as is necessary to fulfil the purpose, or as long as is set out in any relevant contract you hold with us. Once that purpose has been fulfilled, we will securely delete the data, unless we are required to keep the data longer, for legal, tax or accounting reasons, or to provide information in the event of any future legal action against the firm.

YOUR RIGHTS

You have the following rights in relation to the personal data we hold about you:

- access – you can ask us for details of any personal information that we hold about you. If you require additional copies of the data, we may charge an administrative fee;
- corrections – we use reasonable efforts to update the personal information we hold about you, but you can request that we amend any inaccurate or incomplete personal data that we hold;
- restriction- you can request that we suspend the processing of your personal data where, for example, you object to the processing of it (see below) or while we correct any inaccuracies;
- objection- you can tell us that you object to the processing of your personal data where, for example, we are processing it on the grounds of “legitimate interests” (see above) and you feel it impacts your rights. If we feel that we have a compelling reason to carry on this processing, we will let you know, otherwise we will no longer use it for that purpose;
- deletion – we use reasonable efforts to delete your data when we no longer need it (see “How long do you hold personal data for?” above). However, you can also ask us to delete your personal data from our records in certain circumstances. If, for legal reasons we are unable to comply with your request, we will tell you this; and
- transfer – you can ask for any personal data you have previously supplied to us to be transferred to you in a usable electronic format, so you can use it elsewhere.

When you make a request, we may require specific information from you, to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We try to respond to all legitimate requests within one month, unless your request is particularly complex or you have made a number of requests, in which case it may take longer. If this is the case we will keep you updated.

HOW TO CONTACT US

If you have any questions or comments about this privacy policy, please contact:

The Data Protection Leader,
2 & 4 Victoria Road
Barnsley
S70 2BB

Tel: 01226 215215

Email: law@howardandco.co.uk

It would be very helpful to us if, when contacting us, you could include your full name and address, including your postcode and details of the service you are using or have used.

If you are unhappy with the way we have handled your personal data, or how we have responded to any request, please let us know, using the contact details set out above. However, if we are unable to resolve the matter to your satisfaction, you can also contact the Information Commissioner’s Office (www.ico.org.uk).

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