

HOWARD & CO
DATA PROTECTION AND PRIVACY NOTICE

- We use the information you provide primarily for the provision of legal services to you and for related purposes including:
 - addressing correspondence and related documents to other parties and opponents;
 - corresponding with other agencies such as the courts or Government agencies where relevant to the work we are doing for you;
 - maintaining the financial and other personal information we are required to keep on clients under the professional rules we are subject to and by law including our obligations to HMRC;
 - compliance with legal and regulatory obligations and good practice, e.g. identifying clients and verifying their identity;
 - gathering information as part of investigations by regulatory bodies;
 - ensuring business policies are adhered to (such as policies covering IT security and Internet use);
 - operational reasons, such as recording transactions, training and quality control;
 - ensuring the confidentiality of commercially sensitive information;
 - statistical analysis;
 - preventing unauthorised access and modifications to systems;
 - updating and enhancing client records;
 - analysis to help us manage our practice;
 - statutory returns;
 - ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences;
 - staff administration and assessments, monitoring staff conduct, disciplinary matters;
 - credit reference checks via external credit reference agencies.

- Our use of that information is subject to your instructions, the UK General Data Protection Regulation the Data Protection Act 2018 (“DPA”), and our professional duty of confidentiality.

- Please note that our work for you may require us to give information to third parties such as expert witnesses, other professional advisers, our regulators and our bank if they wish to ascertain the source of monies held in our client account. Please also see the section dealing with external audits in relation to the external checks that we are subject to in relation to our quality of work as a firm.

- The legal bases which are relevant to the work we undertake for you are mostly in order that we can satisfactorily perform the contract we have with you and also so that we can protect the interests of our professional indemnity insurers through maintaining suitable records. We are required by law to retain certain data including identity and address details in order that

we can comply with the Government's anti-money laundering controls (see the section entitled "Prevention of Money Laundering and Terrorist Financing"). We would need your consent to send you future marketing information, on which see the wording at the end of this document.

- We may therefore rely upon consent where you have agreed to us sending you that information which is not directly related to the matter upon which we are currently acting. We may also rely upon legitimate interest where we believe that there is a legitimate interest in our using your personal data but in such circumstances we will previously have carried out a legitimate interest assessment to ensure that your data privacy rights are fully protected.
- We do not envisage sending any of your personal data outside the UK or the EU. However, please note that if your email is hosted in a jurisdiction outside of the UK then this may nevertheless occur and in such circumstances this will be outside of our control.
- You have a number of rights as a data subject including the rights to:
 - be informed of the data we hold about you;
 - have any incorrect or out of date data rectified;
 - cease to receive certain forms of communication or to restrict processing;
 - take your data elsewhere ("portability");
 - object to our use of data.
- Unlike certain other business concerns, we do not as a law firm involve ourselves in automated decision making and profiling.
- You also have a right of access under data protection legislation to the personal data that we hold about you. If you would like to make a request to know about the personal data we hold about you then please let us know, preferably in writing, stating "data subject access request". We will also respond to any form of data subject request in any medium. Please note, however, that we will undertake a review of the validity of that request before disclosing whether we hold such data and the nature of that data in order to protect your right to confidentiality.
- If you are unhappy about the way we are managing your data you have a right to object to the Information Commissioner at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (tel: 0303 123 1113). Please also see your rights to complain to the Legal Ombudsman (see the section entitled "Complaints").