

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.

Please note that this privacy policy does not apply to third party websites (if any) that may have links to our own website.

We collect, use and are responsible for certain personal data about you. When we use your personal data we are regulated under the UK General Data Protection Regulation (**UK GDPR**). We are responsible as 'controller' of such personal data for the purposes of the UK GDPR. Our use of your personal data is subject to your instructions, the UK GDPR, other relevant UK and EU data protection legislation (insofar as applicable) and our professional duty of confidentiality.

Clients of this firm should read this policy alongside our general terms and conditions which provide further information on confidentiality.

Our services and website are not aimed specifically at children as they are usually represented (as appropriate) by parents or guardians. If you are a child and you want further information about how we might use your data, please contact us.

Key terms

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

We, us, our	Jones & Groves
Our data protection officer (DPO)	Charlotte Jones Jones & Groves, 2 Aston Court, Bromsgrove Technology Park, Bromsgrove, B60 3AL Tel. 01527 362720 Email. charlotte.jones@jonesgroves.co.uk
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 data Biometric data (where used for identification purposes) 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 tables below set out the personal data we will or may collect in the course of providing legal services to you.

Personal data we will collect. Examples include
Your name, address and home telephone number
Your company details
Information to enable us to check and verify your identity, e.g., your date of birth or passport details
Your gender, if you choose to give this to us
Electronic contact details, e.g., your email address and mobile phone number
Information relating to the matter in which you are seeking our advice or representation
Information to enable us to undertake credit or other financial checks on you
Your financial details so far as relevant to your instructions, e.g., the source of your funds if you are instructing us on a purchase transaction
Information about your use of our IT, communication and other systems and other monitoring information, e.g., CCTV/access control systems

Personal data we may collect depending on why you have instructed us. Examples include but are not limited to
Your National Insurance and tax details
Your bank and/or building society details
Details of your professional online presence, e.g., LinkedIn Profile
Details of your spouse/partner and dependants or other family members, e.g., if you instruct us on a trust matter
Your employment status and details including salary and benefits, e.g., if you instruct us on matter related to your employment or in which your employment status or income is relevant. This could arise, e.g., in relation to a business disposal
Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), e.g., if you instruct us on matter related to your employment or in which your employment records are relevant
Personal identifying information, such as your eye colour or your parents' names, e.g., if you instruct us to incorporate a company for you

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

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, e.g., Companies House or HM Land Registry.

- directly from a third party, e.g.:
 - sanctions screening providers.
 - credit reference agencies.
 - client due diligence providers.

- from a third party with your consent, e.g.:
 - 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.

- via our website—we operate cookies/similar technology on our website (for more information on cookies, please contact Charlotte Jones as our DPO (charlotte.jones@jonesgroves.co.uk))

- via our information technology (IT) / other systems, e.g.:
 - case/document/finance management systems.
 - automated monitoring of our website and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems
 - reception log

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations.

- for the performance of our contract with you or to take steps at your request before entering into a contract.

- for our legitimate interests or those of a third party; or

- where you have given consent - where we need your consent, we will ask for it separately of this privacy policy and you can withdraw your consent at any time

A legitimate interest is when we have a business or commercial reason to use your information so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying upon legitimate interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
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To provide legal services to you	For the performance of 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, i.e., to minimise fraud that could be damaging for you and/or us
<p>Conducting checks to identify our clients and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator</p>	<p>Depending upon the circumstances:</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests</p>
To enforce legal rights or defend or undertake legal proceedings	<p>Depending upon the circumstances:</p> <p>To comply with the legal and regulatory obligations</p> <p>For our legitimate interests i.e., 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 internal business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests, i.e., 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, i.e., to be as efficient as we can so we can delivery the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>Depending upon the circumstances:</p> <p>For our legitimate interests, i.e., to protect our intellectual property and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our practice, e.g., in relation to our financial performance, client base, service/work type or other efficiency measures	For our legitimate interests, i.e., to be as efficient as we can so we can delivery the best service for you at the best price

<p>Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems</p>	<p>Depending upon the circumstances:</p> <p>For our legitimate interests, i.e., 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> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
<p>Updating and enhancing client records</p>	<p>Depending upon the circumstances:</p> <p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests, e.g., making sure that we can keep in touch with our clients about existing and/or new services</p>
<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>Depending upon the circumstances:</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> –existing and former clients. –third parties who have previously expressed an interest in our services. –third parties with whom we have had no previous dealings. 	<p>Depending upon the circumstances:</p> <p>For our legitimate interests, i.e., to promote our business to existing and former clients</p> <p>Consent</p>
<p>Credit reference checks via external credit reference agencies</p>	<p>For our legitimate interests, i.e., for credit control and to ensure our clients are likely to be able to pay for our services</p>

<p>To share your personal data with third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending upon the circumstances:</p> <p>To comply with our legal and regulatory obligations</p> <p>In other cases, for our legitimate interests, i.e., to protect, realise or grow the value in our business and assets</p>
<p>External audits and quality checks, e.g., for the audit of our accounts</p>	<p>Depending upon the circumstances:</p> <p>For our legitimate interests, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

How and why we use your personal data - in more detail

More details about how we use your personal data and why are set out below

Purpose	Processing operation	Lawful basis relied on under UK GDPR	Relevant categories of personal data
<p>Communications with you not related to marketing, including about changes to our terms/policies or changes to the services or other important notices (other than those addressed above)</p>	<p>Addressing and sending communications to you as required by UK data protection laws from time to time.</p> <p>Addressing and sending communications to you as required by law (as applicable)</p> <p>Addressing and sending communications to you about changes to our terms or policies or other important notices</p>	<p>Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))</p> <p>Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1) (b))</p> <p>Our legitimate interests (Article 6((1) (f)), which is to be as efficient as we can so that we can deliver the best service to you</p>	<p>Your name, address and contact information including email address, telephone and company details (if applicable)</p> <p>Your account details/ username</p> <p>Your name, address and contact information including email, address and telephone number (and company number)</p>

How and why we use your personal data - Special category personal data

Certain personal data if we are provided with is treated as “special category” (see **key terms** above) to which additional protections apply under data protection law:

- Data collected reveals racial/ethnic origin/political opinions/religious beliefs/philosophical beliefs/trade union membership
- genetic data
- biometric data (when used to uniquely identify an individual)
- data relating to health, sexual orientation etc

Where we collect/process special category personal data, we will ensure we are also permitted to do so under data protection laws, e.g.

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

How and why we use your personal data - sharing

See **“Who we share your personal data with”** (below) for more information on the steps we will take to protect your personal data where we need to share it with others.

Promotional communications / marketing

We do not at this time use any client’s personal data to provide updates (by email, text message, telephone or post) about legal developments that might be of possible interest and/or information about our services although we reserve the right to do so.

Notwithstanding that we have a legitimate interest in processing your personal data for promotional purposes (see **‘How and why we use your personal data’** above) which means we do not need your consent to send you promotional communications, if we do decide to engage in any promotional activities in the future we will expressly ask you for this consent separately and clearly. Any such consent will include a right to opt out of receiving promotional communications at any time and an explanation as to how to opt out, e.g., writing to Charlotte Jones as our DPO notifying her of your wish to opt out (see **“How to Contact Us”** below).

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

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

Who we share your personal data with

We routinely share personal data with:

- third party professional advisers who we instruct on your behalf or refer you to, e.g., barristers, accountants, tax advisors or other experts.
- other third parties where necessary to carry out your instructions, e.g. HM Land Registry in the case of a property transaction or Companies House in relation to company matters.
- external identity verifiers including money laundering checks and other crime prevention purposes
- credit reference agencies
- our insurers and brokers
- external auditors/accountants, e.g., in relation to the audit of our accounts
- our bank
- our external service suppliers e.g., outsourced bookkeeping providers, IT service/cloud service providers and data storage providers/platforms.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally disclose and exchange information with law enforcement agencies, auditors, courts, tribunals, regulatory bodies and the like to comply with our legal and regulatory obligations.

We may also, should the need arise, share some personal data with other parties (including our or their professional advisors) including potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised, but this may not always be possible. The recipient of any such information will be bound by confidentiality obligations.

If you would like more information about who we share your 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 UK. For more information, including on how we safeguard your personal data when this occurs, see below: **‘Transferring your personal data abroad’**.

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 was collected or as required by law.

As a general rule we will keep your personal data for 7 years from the conclusion of your matter in case you, or we, need to bring or defend any complaints or claims, to show that we treated you fairly and to keep records required by law, thereafter we will delete or anonymise it.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. Further details are available in this respect on request, please contact Charlotte Jones as our DPO as above.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

Transferring your personal data abroad

Where there may be an international dimension to the matter in which we are advising you, it may be necessary for us to share your personal data outside the UK.

We will transfer your personal data outside the UK only where:

The UK government has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy decision).

There are appropriate safeguards in place (e.g., standard contractual data protection clauses published or approved by the relevant data protection regulator) together with enforceable rights and effective legal remedies for you; or

A specific exception applies under data protection law

You can contact us (see **“How to Contact Us”** below) if you would like a list of countries benefiting from a UK (or European) adequacy decision or for any other information about protection of personal data when it is transferred abroad.

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 circumstances, e.g., 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	The right to object: –at any time to your personal data being processed for direct marketing (including profiling). –in certain other situations to our continued processing of your personal data, e.g., 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.
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 affects you

The right to withdraw consent	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 You may withdraw consent(s) by emailing Charlotte Jones as our DPO as above Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on such consent before it was withdrawn
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For further information on each of the above rights, including the circumstances in which they apply, please contact Charlotte Jones as our DPO as above or see the relevant [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the UK GDPR](#).

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

- email, call or write to our Charlotte Jones as our DPO requesting a Data Subject Request form (Form B58 for LG internal purposes) for completion by you –see below: **'How to contact us'**; and
- return to us the completed Data Subject Request form; and
- provide enough information to identify you e.g., your full name, address, client/matter reference number and any additional identity information we may reasonably request from you.
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- 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 technological/organisational security measures to prevent personal data from being accidentally lost or used or accessed/disclosed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place 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.

How to complain

We hope that Charlotte Jones as our DPO can resolve any query or concern you may raise about our use of your personal data, please see **"How to contact us"** below.

You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator) who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113. Please contact us if you would like further information.

Changes to this privacy policy

This Privacy Policy will be reviewed at least annually. It was last updated on 20/10/2023.

We may change this Privacy Policy from time to time. When we do, we will publish the updated version on our website and ask for your consent to the changes if legally required.

How to contact us

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

The DPO's contact details are shown below:

Charlotte Jones Jones & Groves, 2 Aston Court, Bromsgrove Technology Park, Bromsgrove, B60 3AL Tel. 01527 362720 Email. charlotte.jones@jonesgroves.co.uk

Do you need extra help? If you would like this policy in another format, e.g., audio, large print, braille) please contact us (see '**How to contact us**' above).