

#### **Privacy Notice**

#### 1. What is this Notice?

Pilgrim Hope Limited takes privacy seriously and we are committed to protecting it.

This policy relates to our clients, prospective clients, visitors to our website and anybody who makes an enquiry with us and explains when and why we collect personal information about you, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

This is our main privacy notice. We may provide additional, specific privacy information to you as you interact with us in different ways (e.g. that we will only use certain information for specific purposes). To the extent that any of that information differs from what we say below, those specific statements will apply in those circumstances.

This policy may change from time to time so please check this page occasionally to ensure that you're happy with any changes.

#### 2. Who are we?

Pilgrim Hope Limited is a firm of solicitors, regulated by the Solicitors Regulation Authority. We provide civil litigation services. Our senior partner is Robin Torr who can be contacted directly here:

- <u>r.torr@phsols.co.uk</u>
- 01257 422500

Pilgrim Hope Limited is the data controller in relation to the processing activities described below. This means that we decide why and how your personal information is processed. Our registered address is Suite 102, The Standish Centre, Cross Street, Standish, Wigan, WN6 0HQ. We are a Limited Company registered in England and Wales, company number 09863873.

#### 3. What Personal Data Do We Collect?

The personal data we process on you is:

- Name
- Address
- Date of Birth
- Telephone Number
- Documents necessary to identify you
- National Insurance number
- Your signature on various documents

We also collect the following Special Categories of Data in Personal Injury claims in order to be able to establish your legal claim:

- Medical details, including:
  - Details of injuries
  - Details of any previous injuries or accident
  - o Medical records and reports
  - Rehabilitation records and reports
- Details of any care and assistance you may receive

• Details of any possible union membership

We will not share any special categories of data with anyone else without your explicit consent unless we are required to do so by law.

# 4. Why do we need this information and what is our legal basis?

We need this information in order to:

- Register you as a new client which is necessary in order for us to enter into a contract of services with you
- To prevent fraud, we have a legitimate interest to process your personal data in order to prevent fraud
- Providing you with advice as part of that contractual obligation
- Perform certain legal and regulatory requirements such as checking your identity and providing certain information to regulatory authorities
- As a legitimate interest to provide you advice prior to entering into a contract with you
- To be able to present your claim to the opposing party and progress it through the Court if necessary
- To establish facts of a case, we have a legitimate interest as a form of solicitors to process details of any witnesses in order to progress our Client's claim
- As a legitimate interest in order to be able to provide you from time to time with details of other legal services we offer
- To collect and recover money owed to us
- To administer and protect our business and this website which is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)
- Necessary to comply with a legal obligation
- To use data analytics on our website via cookies to as we have a legitimate interest in improving our website, products and services, customer relationship experience and marketing strategies
- We may also ask you to undertake a survey as a legitimate interest to ensure client satisfaction

# 5. Who do we share it with?

From time to time we need to share your personal data with other parties in order to provide an effective service and to protect our business interests, these include:

- Courts
- Opposing Parties, their insurers and solicitors
- Barristers and Barrister's Chambers
- Third Parties who prepare Court Bundles
- The Police
- Other solicitors and advisors
- Motor Insurers Bureau
- Medical Agencies and Medical Experts
- GP Surgeries and Hospitals
- Rehabilitation Providers
- Law Costs Draftsman
- Legal Indemnity Insurers
- Compensation Recovery Unit
- HMRC

- IT providers
- Disaster Back Up Services
- Digital signing companies
- Process servers

# 6. Change of purpose

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please call us on 01257 422500.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

# 7. Retention periods

Pilgrim Hope Limited will retain process personal data for the duration of the case matter and will store personal data for 6 years from the date of closure of the matter.

# 8. International Transfers

We may share your personal data with our signing service Docusign who are based in the US. Docusign has in place approved Binding Corporate Rules for protection of personal data and provides an adequate level of protection for your personal data.

# 9. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

# 10. Your Rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary to retain such data
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means)

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact us using the details in Paragraph 2 above.

#### No fee required – with some exceptions

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### What we may need from you

We may need to request 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 may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

# 11. Changes to this Notice and Your Duty to Inform us of Changes

This version was last updated on 14 June 2018. Historic versions can be obtained by contacting us using the details in Paragraph 2 above.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

#### 12. Queries, Requests or Concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us using the details in Paragraph 2 above.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the <u>Information Commissioners Office</u> on 03031231113 or via email <u>https://ico.org.uk/global/contact-us/email/</u> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.