

## Privacy Policy & GDPR

**CFC - Children, Family and Criminal Solicitors** respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Changes to the Privacy Notice

This policy is updated from time to time. The latest version is published on this page. This website privacy policy was updated on: **10<sup>th</sup> January 2022**.

### Scope of Policy

This privacy policy describes how **CFC - Children, Family and Criminal Solicitors** collects, uses and shares the information you provide to us and the information we collect in the course of operating our business. This policy also pertains to the information that is collected through <https://www.cfcsolicitors.co.uk> whose ownership lies with **CFC - Children, Family and Criminal Solicitors**, whose office is at: **1<sup>st</sup> Floor, Romer House, 132 Lewisham High Street, London, SE13 6EE**.

### Purpose of Policy

The policy will govern the privacy of those internet users who choose to use <https://www.cfcsolicitors.co.uk>. This policy will demonstrate how **CFC - Children, Family and Criminal Solicitors** complies with the Data Protection Act 1998 (DPA), the Privacy & Electronic Communications Regulations (PECR) and the General Data Protection Regulation (GDPR).

Through each section, this privacy policy aims to explain how the various areas of the website may affect your privacy and personal details, how we collect, manage and store those details, and how your rights under the GDPR, DPA & PECR are adhered to. Additionally, it will explain the use of cookies, by way of an extension to the Cookie Policy for this site.

### Controller

**CFC - Children, Family and Criminal Solicitors** is the controller and responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice). We have appointed a data privacy 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 privacy manager using the details set out below.

### Informing us of changes to your Personal Data

It is important that the personal data we hold about you is accurate and current. We will endeavour to ensure that your personal data, which we have collected, remains accurate. In addition to this, we also respectfully ask you to keep us informed if your personal data changes during your relationship with us.

### External Links & Third Parties

**CFC - Children, Family and Criminal Solicitors** determine the external links that are included within the site: <https://www.cfcsolicitors.co.uk>. Whilst we endeavour to provide quality and safe external links, visitors to the website are advised to adopt a policy of caution before clicking any external and/or third-party link, appearing throughout this site.

Despite our attempts to carefully create and manage our website, **CFC - Children, Family and Criminal Solicitors** cannot guarantee or verify the contents of any externally linked websites. By clicking through on any external link present on <https://www.cfcsolicitors.co.uk>, the visitor assumes the risk and full liability of visiting those third-party sites. **CFC - Children, Family and Criminal Solicitors** cannot be held liable for any damages or implications, because of this action.

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.

### **Data We Collect**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Any personal information that is provided to us, through our website, will never be leased, distributed or sold to third parties, unless we have your permission, or the law requires us to. The personal information that we hold about you is stored and processed under our Data Protection Policy, in line with the Data Protection Act 1998, PECR and GDPR.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes email address, telephone numbers and utility bills as proof of address.
- **Financial Data** includes bank account details, bank statements, credit information, employment information and salary slips.
- **Transaction Data** includes details about transactions to and from you and services you have purchased from us.
- **Profile Data** includes your interests, preferences, reviews & feedback and survey responses (if relevant).
- We will process personal information that you give to us including when you email us or contact us, specifically, through various channels, as follows:
- **Signing up for services on our Site:** when you sign up for newsletters, webinars, events or obtain legal services from us or when you contact us with queries or respond to our communications the personal information you provide may include your full name, title, telephone number, email address and content, date and time of your email correspondence and information about your employer or your business.
- **In connection with our provision of legal services:** if you are a client of CFC - Children, Family and Criminal Solicitors you will provide us with personal information when you or the company you represent becomes a client. If you are not a client we may collect or receive your personal information because you are involved in one of our client's matters.
- **Recruitment application:** when you apply for a role with us you may provide us with your full name, date of birth, nationality, education and qualification details, your gender, your CV, photograph, passport details, marital status, home address and home telephone number, mobile telephone number and other details set out in your application

We may collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

As part of the performance of a contract between **CFC - Children, Family and Criminal Solicitors** and our clients, we do collect information relevant to your case. This may also include information about any criminal convictions and county court judgments, and credit information for the purposes of assessing your credit, only where relevant to the legal work that we carry out, on your behalf.

### **How Your Personal Data is Collected**

We use different methods to collect data from and about you including through:  
Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:  
Instruct CFC - Children, Family and Criminal Solicitors to be your legal representatives;  
Completing and signing any authority letter;  
Give us feedback / reviews.

### **Information Obtained from Other Sources**

- If we collect or receive your personal information in the context of our provision of legal services we might receive information from third parties such as your employer, other parties relevant to the services we are providing (e.g. counterparties in transactions) and others such as regulators and authorities. That information could include your name, contact details, employment details and other information relevant to the legal services that we are providing to our client.
- If you apply for a position with us we may collect personal information relating to past employment, qualifications and education, opinions from third parties about you, past employment history and other details about you, which will be provided to us by a third party that provides background screening services to us.

### **How We Use Your Personal Data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- a) use it to provide legal services to the relevant client
- b) use it to engage in marketing and business development activity in relation to our legal services. This may include sending you newsletters, legal updates, marketing communications and other information that may be of interest to you
- c) where you have applied for a position with us, to review and process your job application
- d) to comply with legal and regulatory obligations that we have to discharge
- e) use it to establish, exercise or defend our legal rights or for the purpose of legal proceedings
- f) record and monitor your use of our websites or our other online services for our business purposes which may include analysis of usage, measurement of site performance and generation of marketing reports
- g) use it for our legitimate business interests, such as undertaking business research and analysis, managing the operation of our websites and our business
- h) use it to look into any complaints or queries you may have, and
- i) use it to prevent and respond to actual or potential fraud or illegal activities.

You can find below more about the types of lawful basis that we will rely on to process your personal data.

## **Legitimate Basis for Processing Your Personal Data**

We rely on the following legal grounds to process your personal information, namely:

- **Consent** - we may (but usually do not) need your consent to use your personal information. You can withdraw your consent by contacting us (see below).
- **Performance of a contract** - we may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.
- **Legitimate interest** - we may use your personal information for our legitimate interests, some examples of which are given above.
- **Compliance with law or regulation** - we may use your personal information as necessary to comply with applicable law/regulation.

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.

Note that 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 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
- Type of data
- Lawful basis for processing including basis of legitimate interest

### **Purpose/Activity**

To register you as a new client

### **Type of data**

- Identity
- Contact

### **Lawful basis for processing including basis of legitimate interest**

Performance of a contract/professional relationship with you

### **Purpose/Activity**

To process and manage your transaction including:

- a) Manage payments, fees and charges
- b) Collect and recover money owed to us

### **Type of data**

- Identity
- Contact
- Financial
- Transactional

### **Lawful basis for processing including basis of legitimate interest**

1. Performance of a contract / professional relationship with you
2. Necessary for our legitimate interests (to recover debts due to us)

### **Purpose/Activity**

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
- c) Manage your contact preferences
- d) Ensure your data records are accurate and up-to-date

**Type of data**

- Identity
- Contact
- Profile

**Lawful basis for processing including basis of legitimate interest**

1. Performance of a contract / professional relationship with you
2. Necessary to comply with a legal obligation
3. Necessary for our legitimate interests (to keep our records updated)

**Change of Purpose**

We will only use your personal data for the purposes for which we have collected, and you have explicitly consented to. Should we require 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, seeking your consent if and when necessary.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**Disclosures of Personal Data**

We may have to share your personal data with external third parties, set out below:

**Third party agents/suppliers or contractors**

Bound by obligations of confidentiality, in connection with the processing of your personal information for the purposes described in this Policy. This may include, but is not limited to, IT and communications service providers.

**Third parties relevant to the legal services that we provide**

This may include, but is not limited to, counterparties to transactions or litigation, other professional service providers, regulators, authorities, governmental institutions and stock exchanges.

**To the extent required by law, regulation or court order**

For example, if we are under a duty to disclose your personal information in order to comply with any legal obligation.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

Additionally, when required, we carry out due diligence on third parties to ensure that they comply with the Data Protection Act 1998, incorporating GDPR. In particular, Article 32 which deals with the obligations and specific requirements to the security of data processing.

**International Transfers**

There may be, on occasion, the need to transfer your personal data outside the European Economic Area (EEA). Should this be deemed necessary, in compliance with a legal obligation, we will inform you in advance.

**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.

Additionally, we have put into 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.

### **Data Retention**

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and regulatory purposes.

### **How to Contact Us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, please contact us:

[info@cfc solicitors.co.uk](mailto:info@cfc solicitors.co.uk)

020 3488 0155