

KENWORTHY'S CHAMBERS PRIVACY POLICY

Policy Title	Privacy Policy
Author Name/Title	Marketing Manager
Version	V2.0
Status	Active
Classification	Internal
Issue Date	05/05/2018
Effective Date	15/05/2018
Date Reviewed by Management Committee	24/05/2022

Kenworthy's Chambers ("the Chambers") honours the rights of its customers, clients, employees and other users including website visitors' right to privacy and data protection.

The Chambers are fully committed to complying with the provisions of all applicable Data Protection legislation and regulations such as the Data Protection Act and EU GDPR.

This Privacy Policy ("Policy") describes how the Chambers collect, use, share, and retain personally identifiable information provided by its customers, clients and other users including users of this website.

The policy will be continuously assessed against new technologies, business practices, regulatory changes and the evolving needs of the Chamber.

The Chambers' employees, Barristers, Contractors and other Agents adhere to strict data security standards. All <u>our Barristers</u> are registered with the Information Commissioners Office, the UK's Data Protection Authority. You can <u>verify our Barrister's ICO registrations</u> by typing their names in the relevant search boxes.

The Chambers may change this policy from time to time by updating this page. You should check this page occasionally to ensure that you are happy with any changes. This policy is effective from 15th May 2018 and was last updated on 24th May 2022.

Data Controller

The Data Controller for all personal data collected via this website is Kenworthy's Chambers, with its offices at Arlington House, Bloom Street, Salford, Greater Manchester M3 6AJ. The data thus



collected may be made available to the Barristers and their Clerks.

Data Collection

The Chambers collects and maintains a variety of personally identifiable information, including the following:

- Names, email addresses, phone numbers and postal addresses
- Demographic information, such as postcode, gender, ethnicity, preferences and interests
- Financial and payment details
- Family details
- Lifestyle and social circumstances
- Education, training and employment details
- Inquiries made

Concerning any matters our Barristers are representing you in, we may collect and maintain the following information:

- Physical or mental health details
- Racial or ethnic origin
- Political opinions
- Religious or other beliefs of a similar nature
- Trade union membership
- Sexual life
- Offences and alleged offences
- Criminal proceedings, outcomes and sentences

The Chambers collects information directly from individuals, their family members, Solicitors and from other relevant sources such as court records. The information could be collected through emails, phone calls, online registration forms, event registration forms, face-to-face meetings, interviews, discussions with other Solicitors and Barristers, cross-examination in courts etc. The Chambers do not collect personal data about individuals except when there is a legitimate representational, legal, or business requirement to collect that information or when such information is provided on a voluntary basis.

Users of this website should also be aware that non-personal information and data may be automatically collected through the standard operation of the Chambers' web servers, and by the use of <u>cookies</u> technology and/or Internet Protocol ("IP") address tracking. Non-personal identification information might include the type of computer system and browser used by you, the operating systems, the Internet service providers, and other similar information.



The Chambers' web server also automatically gathers information about the top viewed and visited pages and links on our website, top entry and exit points, a number of form completions, time spent on pages, top downloads, top keywords used offsite to lead customers to our website, your internet protocol (IP) address, information collected via cookies, the areas you visit on the website, the links you may select from within the website to other external websites, and device event information such as system activity, crashes, hardware settings, browser type etc.

Most browsers are set to accept cookies. You can set your browser to refuse cookies, or to alert you when cookies are being sent; however, if you disable cookies, the full functionality of the Chambers' websites may not be available to you. The information thus collected enables us to develop and customise our services better to meet your needs and preferences, and to bring to your attention our services, events, and other relevant content.

Purpose of Processing

The personal data collected may be used by the Chambers to provide you with legal advice, representation and other services that you request, to give you information relating to the Chambers' services, important news updates, customer administration, responding to queries received from clients, Solicitors, or other relevant stakeholders and to send marketing communications on the Chambers' behalf.

If you are interested in working for us, we will only use your personal data to process your application, monitor recruitment and provide statistics. Personal data about unsuccessful candidates will be retained for six months after the recruitment process is completed, at which point it will be disposed of securely.

Data Sharing

We do not sell, rent, or otherwise share any personally identifiable information with any external agency for their independent use except where we are required to do so by law, or with your explicit permission. However, personally identifiable information will be presented as part of legal proceedings in a court of law.

We may share information with Solicitors and other Barristers where representation involves other Solicitors and Barristers. When required to do so, we will disclose personally identifiable information to law enforcement agencies, tax authorities, other government agencies, or third parties both within and outside the legal jurisdiction in which you reside, as may be required of us by the laws of any jurisdiction that may apply to us; or as we may deem necessary to provide you with legal advice, representation and other services. In these circumstances, we will make reasonable efforts to notify you before we disclose your personal information, except in circumstances where prior notice is prohibited by applicable law or is not possible or reasonable.



Under ordinary circumstances, data will not be transferred to any agency located outside the EU.

Data retention

The personal data collected is stored in the Chambers' LEX case management software and other appropriate data management systems, both paper-based and electronic. At regular intervals, we will:

- Review the length of time we keep your personal data for
- Consider the purpose or purposes for which we hold your personal data for, in deciding whether, and for how long, to retain it
- Securely delete information that is no longer needed for that purpose or those purposes
- Update, archive or securely delete information if it goes out of date

We will retain your personal data for as long as is necessary for the required service to be provided to you. All retained personal data is subject to the controls of our data protection policy and will be securely disposed of when it is considered no further use.

Security

The Chambers use reasonable measures to safeguard personally identifiable information.

The implemented measures will be appropriate to the type of information maintained and to ensure compliance with all relevant legislation governing the protection of personal information.

Measures are implemented to preserve the confidentiality, integrity and availability of personal information.

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 only those employees, Barristers, Contractors or Agents who have a legitimate business need to have access to that data.

The employees, Barristers, Contractors or Agents will process your personal data in accordance with our instructions. They will be subject to a duty of confidentiality and due care with respect to handling personal data.

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

The Chambers' employees are trained on data security and information protection.



Relevant areas of the Chamber's website will employ Secure Socket Layer ("SSL") or Transport Layer Security ("TLS") encryption technology to enhance data privacy and help prevent the loss, misuse, or alteration of information collected and retained by the Chambers.

Links to Third-Party Sites

Where appropriate and only for the legitimate business needs of the Chambers, we may provide links to third-party websites or advertisements which contain links to third-party sites. These links are provided as a service to website users.

The linked third-party websites are operated by independent entities that have their own privacy policies. This Privacy Policy does not apply to other websites or the use that those entities make of your information. The Chambers have no control over the content displayed on other websites, nor over the measures, if any, that are taken by such sites to protect the privacy of your information.

The Chambers' website may also serve third-party advertisements or other content that contains their own cookies or tracking technologies. The Chambers cannot and do not control the use of those technologies.

Opt-Out

The Chambers offer legal advice and representation to clients on a variety of matters. As such, we are statutorily required to maintain information on clients, court proceedings, advice given etc.

If you are a client to whom one of the Barristers of the Chambers has provided legal advice or representation, you cannot opt-out of important information the Chambers are required to provide you as per the Chamber's contractual or legal obligations.

The Chambers also sends promotional material promoting its events, lectures, services and other relevant offerings. If you do not wish to receive marketing material, you may opt-out. Every marketing e-mail will include an unsubscribe link at the bottom. You may also notify the Chambers in writing as set out below.

Social Media

We may use third-party provided tools such as Hootsuite to manage our social media interactions. If you send us a private or direct message via social media, the message may be stored by Hootsuite.

Like other personal data, these direct messages will not be shared with any other organisations.

Access, Review and Correction



General Data Protection Regulations give you the right to access your personal data held by us ("subject access request").

If you have an established business relationship with the Chamber, you may request from us a list of the categories of personal information held about you.

Subject access requests must be made in writing to the details below. We will endeavour to respond to the request within a reasonable period and in any event within one month as required by the relevant provisions in the GDPR.

The personal data we hold about you must be accurate and current. We will take all reasonable measures to ensure that the personal data we hold about you is accurate. We have also implemented procedures to enable you to review and correct your personal information, should there be any changes to your circumstances or errors in the gathered data.

When you request to access or review the personal data we hold about you, we will request you verify your identity before the request can be fulfilled.

Privacy Rights

In addition to the rights of access, review and correction, you have the right to object to your personal data being processed for any particular purpose, or to request that we stop using your information.

If you wish to exercise these rights, please e-mail dataprotection@kenworthysbarristers.co.uk or send a letter marked "Data Protection" to the Chambers' offices at Arlington House, Bloom Street, Salford, Greater Manchester M3 6AJ.

If you have further concerns about how we use your personal data, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the data protection authority for the UK.

Please visit the <u>Information Commissioner's Office (ICO)</u> for more details on your data protection rights and how to contact them.