

# Privacy Policy

This document sets out the privacy policy of Boodle Hatfield LLP (“us”, “our” or “we”). Boodle Hatfield LLP is a limited liability partnership based in London and Oxford, and registered in England and Wales under number OC318080. Our registered office is at 240 Blackfriars Road, London SE1 8NW. Any queries in relation to this policy should be addressed to the Data Protection Partner at the above address or via the contact form on our website.

We comply with data protection legislation and are committed to safeguarding personal data collected by us or provided to us. The information we use, which includes personal data, is subject to data protection legislation, your instructions and our professional duties including confidentiality. We will take all steps reasonably necessary to procure that your information (including personal data) is treated in accordance with applicable data protection legislation and in accordance with this privacy policy. We are the data controllers of any personal data collected by us or provided to us.

This privacy policy contains information on 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 the relevant data protection regulators in the event you have a complaint.

## How we use your personal data

We will only use your personal data as follows:

1. where you have given consent;
2. to comply with our legal and regulatory obligations;
3. for the performance of a contract with you or to take steps at your request before entering into a contract; or
4. where we have a legitimate interest to do so, as further detailed below.

A legitimate interest applies when we: (i) have a business or commercial reason to use your personal data that is not overridden by your own rights and interests; and (ii) we consider that the processing of your personal information is necessary in view of the legitimate interests which would be reasonably expected to allow us to operate our business, and which when balanced with your rights, will have a minimal impact on your privacy. The legitimate interests we identify are as follows:

- to enable us to provide effective services to customers;
- to ensure the functioning and continuity of our services and business operations;
- to conduct necessary customer due diligence checks including identity verification, credit

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- reference and screening checks;
- to protect our data and use of our premises, including in relation to the prevention and detection of criminal and dishonest activity;
- to improve operational efficiency, training and quality control, including conducting statistical analysis and external audits to help us manage and improve our business; and
- to pursue business development initiatives and to keep our customers and other professional contacts informed about legal and industry updates and the services that we offer.

## When we obtain your personal data

We may obtain your personal data by way of: (i) your providing it to us; (ii) from third parties; or (iii) using open sources. We obtain personal data in the following circumstances when:

- we provide legal services to you or you are a party to a matter we are advising on, in order that we can advise, seek instructions, and represent clients on such matters;
- you are listed on one of our mailing lists, to send you marketing approaches, notification of events, updates and materials;
- you visit our website, to provide a more relevant, effective website experience and to monitor who uses our website and how. Please also refer to our Cookies Policy [here](#);
- you visit our offices and/or attend our events, in order to manage arrangements for such visits and events and to ensure your safety;
- any other circumstance where you provide information to us or request information from us.

## Marketing and events

With your consent, we will only use your personal data to provide you with updates on legal developments or details of our services that may be of interest to you, and to invite you to events and training sessions. If you attend an event or training session organised or hosted by us, we may disclose your details to others who attend or participate in the organisation of that event. If at any point you no longer consent to our contacting you for such purposes, please tell us your consent is withdrawn by emailing us at [bh@boodlehatfield.com](mailto:bh@boodlehatfield.com).

## Types of personal data we handle

Where relevant to the circumstances set out above, we may use the following types of personal data:

- contact details such as names, postal addresses, email addresses and telephone numbers;

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- professional information such as job titles, previous jobs, professional experience, qualifications and C.V. details;
- where relevant and provided, information about personal life hobbies and interests; or
- when you access our website, personal data from your IP address.

Where necessary and legally permitted, we may also receive or collect other personal information that may include more sensitive or special data such as diversity and health data, and details of offences and related proceedings.

### **Third-party sharing**

We will only disclose your personal data: (i) to successors in title to our business; (ii) to suppliers and external agencies we engage to process data on our behalf; (iii) to necessary third parties in order to meet the purpose of our use of such personal data (such as our professional indemnity insurers, brokers, auditors and other professional advisors); and (iv) where disclosure is required by law or by any regulatory authority.

While, unless otherwise agreed, we may not disclose to others that you are a client, once the details of our acting for you on a matter are in the public domain (unless as a result of an unauthorised disclosure by any party), we may disclose that we acted for you and the general nature of the work undertaken. Such disclosures will be made principally for pitches and promotional purposes.

### **Information security**

We take appropriate technical and organisational measures to safeguard your personal data from loss, damage or tampering. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

Your personal data is generally not transferred to any destination outside the UK or the European Economic Area (“EEA”) but may be transferred to and stored at a destination outside the UK or the EEA in the course of us carrying out our business and where there are appropriate safeguards to do so. Your information may be processed by one of our suppliers outside the UK or the EEA. Such suppliers may be engaged to provide support services, including customer due diligence checks, typing, photocopying, printing and debt collection.

### **Data retention**

We will retain your personal data for as long as it is needed, in accordance with the purpose it was obtained and in order to comply with applicable legal and regulatory requirements. Different retention periods apply to different types of personal data. Following the end of the of the relevant retention period, we will delete or anonymise your personal data. For further information on this, please contact us via our contact details shown at the end of this policy.

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## Your rights

You and all data subjects have data protection rights as set out below. These can be exercised in certain circumstances.

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 circumstances.
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 circumstances
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 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 significantly 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 at any time. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.
Non-UK complaints	If you are located outside of the UK, you may also have the right to make a complaint to the relevant authority in your jurisdiction.

If you would like to exercise any of these rights or if you have any query or complaint concerning personal data or this policy, please contact us at [bh@boodlehatfield.com](mailto:bh@boodlehatfield.com) or by post at the following address:

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Data Protection Partner  
Boodle Hatfield LLP  
240 Blackfriars Road  
London  
SE1 8NW

If for any reason we are unable to address or resolve your query or complaint to your satisfaction, you can contact the Information Commissioner's Office (ICO), the UK's data protection authority at [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint) or via their helpline on 0303 123 1113.

**December 2022**