

# GLP SOLICITORS

## Data Protection - Privacy policy

This policy is intended to explain how we use your information and what your rights are in relation to how we use your information.

Please read this privacy policy carefully. This privacy policy applies to our use of any and all data collected by GLP Solicitors provided by you in relation to your use of the Website or by other means, including by post, face-to-face meetings or electronically.

### A) IF YOU ARE A VISITOR TO OUR WEBSITE (*see below for 'IF YOU ARE A GLP SOLICITORS CLIENT'*)

This privacy policy applies between you, the user of this Website and GLP Solicitors and GLP Legal Management Limited ('the Legal Practices'), the owners and provider of this Website. The Legal Practices take the privacy of your information very seriously.

#### Definitions and interpretation

1) In this privacy policy, the following definitions are used:

<b>Data</b>	Data is collectively all information that you submit to the GLP Solicitors' website, by post, face-to-face meetings or electronically. This definition incorporates, where applicable, the definitions provided in the General Data Protection Regulation 2016 (GDPR) which came into force in May 2018.
<b>The Legal Practices</b>	GLP Solicitors and GLP Legal Management Limited are respectively individual partnerships and a company based and, where appropriate, incorporated in England and Wales. A list of the Legal Practices trading independently as 'GLP Solicitors' is included at the end of this policy. The administrative office for data organisation is GLP Legal Management Limited whose registered office is at 55 Queen Street, Salford, Manchester M3 7DQ, and to whom all enquiries should be directed;
<b>Cookies</b>	Cookies are a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
<b>UK and EU Cookie Law</b>	The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
<b>User</b>	You and any third-party that accesses the Website and is not either (i) employed by the Legal Practices and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services for the Legal Practices and accessing the Website in connection with the provision of such services;
<b>Website</b>	the Website that you are currently using, <a href="http://www.glpplaw.com">www.glpplaw.com</a> , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2) In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa;
- b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
- d. "including" is understood to mean "including without limitation";
- e. reference to any statutory provision includes any modification or amendment of it;
- f. the headings and sub-headings do not form part of this privacy policy.

3) Scope of this privacy policy:

This privacy policy applies only to the actions of the Legal Practices and users with respect to this Website. It does not extend to any Websites that can be accessed from this Website including, but not limited to, any links we may provide to social media Websites.

#### Data collected

- 4) We may collect from you or other sources the following Data, which includes personal Data, including:
- a. name(s), address(es), including email, post code(s) and relevant telephone numbers to enable us to contact you;
  - b. confirmation of your date of birth, passport details and similar documents to enable us to verify your identity;
  - c. your racial or ethnic origin, religious beliefs, gender or sexual orientation e.g. if instructing us on discrimination;
  - d. your employment records, job title, sickness & attendance records e.g. if instructing us on a personal injury matter;
  - e. your profession or occupation, pension arrangements records e.g. if instructing us on a family law matter;
  - f. your financial details so far as is relevant to your instructions, e.g. the source of funds for a purchase transaction;
  - g. your identifying information, including eye colour, parents, e.g. if instructing us on a company formation;
  - h. financial information such as credit/debit card and bank details for the purpose of making or receiving payments;
  - i. information relevant to and relating to the matter in which you are seeking our advice or representation;
  - j. IP address (automatically collected); operating system and web browser type and version (automatically collected);

- k. a list of URLs starting with a referring site, your activity on this Website and the exit site (automatically collected);
- l. in each case, in accordance with this privacy policy.

5) We do not store credit/debit card details electronically nor do we share customer details with any third party.

### **Our use of Data**

- 6) For the purpose of GDPR, the Legal Practices are each separately registered as a “Data Controller”. The Information Commissioner’s registration reference applied to each individual GLP Solicitors practice is shown on the final page of this Privacy Policy.
- 7) We will retain any Data you submit for 12 months.
- 8) Unless we are obliged or permitted by law to do so, subject to any third-party disclosures specifically set out in this policy, your Data will not be disclosed to third parties.
- 9) All personal Data is stored securely in accordance with the requirements of the General Data Protection Regulation 2016. For more details on security see the clauses below (*Security: 21-24*).
- 10) Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
  - a. internal record keeping;
  - b. improvement of our products/services;
  - c. transmission by email of promotional materials that may be of interest to you;
  - d. contact for market research purposes which may be done using email, telephone, fax or mail and such information may be used to customise or update the Website;
  - e. in each case, in accordance with this privacy policy.
- 11) Our legal basis for processing your personal data for the purposes described above is for our legitimate interests in managing our business, improving our services and promoting our business.

### **Third-party Websites and services**

- 12) The Legal Practices may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services have access to certain personal Data provided by Users of this Website.
- 13) Any Data used by such parties is used only to the extent required by them to perform the services that we request. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third-parties will be processed within the terms of this privacy policy and in accordance with the General Data Protection Regulation 2016.

### **Links to other Websites**

- 14) This Website may, from time to time, provide links to other Websites. We have no control over such Websites and we are not responsible for the content of these Websites. This privacy policy does not extend to your use of such Websites. You are advised to read the privacy policy or statement of other Websites prior to using them.

### **Changes of business ownership and control**

- 15) The Legal Practices may, from time to time, separately expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of the Legal Practices. Data provided by users the Legal Practices, where it is relevant to any part of any business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
- 16) We may also disclose Data to a prospective purchaser of our business or any part of it.
- 17) In the above instances, the Legal Practices will take steps with the aim of ensuring your privacy is protected.

### **Controlling use of your Data**

- 18) Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:
  - a. the use of Data for direct marketing purposes; and
  - b. the use of Data for sharing Data with third-parties.

## Functionality of the Website

- 19) To use all features and functions available on the Website, you may be required to submit certain Data.
- 20) You may restrict your internet browser's use of Cookies. For more information see the clause below (*Cookies: 24-30*).

## Security

- 21) Data security is of great importance to the Legal Practices and to protect your personal Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.
- 22) If password access is required for certain parts of the Website, you are responsible for keeping this password confidential.
- 23) We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the Website.
- 24) We strongly advise you never to send any bank details, sort code or account number, private or otherwise by way of narrative in an email text. Using an unencrypted attachment, PDF, Word, Excel document, etc., is at your own risk.

## Cookies

- 25) This Website may place and access certain Cookies on your computer. The Legal Practices uses Cookies to improve your experience of using the Website and to improve our range of services. The Legal Practices have carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
- 26) All cookies used by this Website are used in accordance with current UK and EU Cookie Law.
- 27) Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling the Legal Practices to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
- 28) This Website may place the following Cookies, the type and purpose being:
  - a) Strictly necessary cookies These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
  - b) Analytical/performance cookies They allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
  - c) Functionality cookies These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- 29) You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
- 30) You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- 31) It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

## Using our enquiry form or requesting a call back

- 32) If you submit personal details to us by completing and submitting our contact forms, we will use your information to:
  - a) Contact you to respond to your request for contact;
  - b) Send information to you about the Legal Practices and their services, where you have given us express authority to do so.
- 33) We will add your contact details to our electronic client database and keep them for as long as you provide your consent for us to use your contact details in this way.
- 34) Our lawful basis for using your information in this way will be two-fold:
  - a) For our legitimate interests in marketing our services; and

b) Upon your express consent (where required by law).

35) Will not share information received through our contact form with any third-party unless you expressly authorise us to do so or we are required by law.

#### **Transfers outside the European Economic Area**

36) We do not send or store any of your information outside of the European Economic Area.

#### **B) IF YOU ARE A GLP SOLICITORS' CLIENT (see above for GLP SOLICITORS' WEBSITE USERS)**

37) For definitions and interpretations, please refer to paragraphs (1) and (2) above. See also paragraphs (4) to (11) and (24).

38) We keep your information confidential and will not disclose it to third parties unless disclosure is:

- a) Authorised by you;
- b) Necessary as part of the legal services we are providing to you (to perform our contract with you);
- c) Required by law or our professional rules;
- d) Necessary for the purposes of our legitimate interests or those of a third-party (in other words, we have a compelling justification for the disclosure); or
- e) Necessary to protect your vital interests or those of another person i.e. to protect a life.

39) We use your information primarily to provide legal services to you. We also use your information for accounting and billing purposes; to comply with our legal and regulatory obligations, and to manage our business effectively. With your authority, we may also send you information about our services or events that we think may be of interest to you. We will seek your written consent to do this.

40) We may, on your authority, work with other professionals to progress your matter, and may need to disclose relevant information about you to them. Examples include: barristers/ counsel, experts, costs specialists, other lawyers etc. We will seek your written consent to do this.

41) Where there is another party(ies) to your matter (i.e. opponent in litigation, buyer/seller to a property transaction etc.), we will liaise with their legal representative (or the third-party directly if they are not represented) in order to progress your matter. This may involve us disclosing relevant information about you, to this party(ies) in order for us to provide our legal services to you (to perform our contract with you). Please contact us if you have any queries about this.

42) Sometimes we outsource part of our work to other people or companies to improve efficiency and your client experience. We will always carry out due diligence and obtain confidentiality agreements from such outsourced providers. We will seek your written consent as to whether you are happy for us to outsource relevant aspects of your file as appropriate to our providers. If you would like more information about our outsourcing arrangements, please contact us.

43) We may in some cases consult credit reference agencies in order to assess your creditworthiness. If you are an individual, we will seek your written consent before we do this. Please note that if you withhold your consent, this may limit the payment options that will be available to you. For example, we may not complete work for you unless you have made a payment on account. Details of the credit agency we use are available on request.

44) The Legal Practices may become subject to periodic checks by Law Society approved Consultants and/or Assessors and compliance specialists that we engage the support of. This could mean that your file is selected for checking, in which case we would need your consent for the checking to occur. All such checks are conducted by individuals who have provided the Legal Practices with a Confidentiality Agreement. We will seek written consent as to whether you are happy for your file to be selected for file auditing and vetting. If you refuse to give us consent to checks, your refusal will not affect the way your case is handled in any way.

45) We may correspond with you by email if you provide us with an email address, unless you advise us in writing that you do not wish us to do so. You acknowledge that email may not be secure. Email will be treated as written correspondence and we are entitled to assume that the purported sender of an email is the actual sender and that any express or implied approval or authority referred to in an email has been validly given. Please be aware that the Legal Practices may monitor and read any email correspondence travelling between you and any mail recipient at the Legal Practices as part of its monitoring activities to ensure compliance with the Legal Practices' Information Management & Security Policy.

46) We will aim to communicate with you by such method as you request. More often than not this will be in writing but may be by telephone if it is appropriate.

- 47) Where you provide us with fax or email addresses for sending documents or material, you are responsible for ensuring that your arrangements are sufficiently secure and confidential to protect your interests. You must tell us if this method of communication is not secure so that can use an alternative method.
- 48) The Internet is not secure and there are risks if you send sensitive information in this manner or you ask us to do so. Please be aware that the data we send by email is not routinely encrypted.
- 49) We will take reasonable steps to protect the integrity of our computer systems by screening for viruses on email sent or received. We expect you to do the same for your computer systems.
- 50) It is very unlikely that we will change our bank account details during the course of your matter. In any event, we will never contact you by email to tell you that our details have changed. If you receive any communications purporting to be from this firm, that you deem suspicious or have any concerns about (however slight), please contact our office by telephone straightaway.
- 51) During the progress of your matter, we may hold your information both electronically and in paper format. We will use all reasonable measures to ensure that your information remains confidential and will advise you immediately if we believe that any of your information has been released. We have procedures in place with our staff members to ensure that your information is only seen by members of staff who have a legitimate reason for accessing your file, such as fee earners and support staff working on your file and senior members of the Legal Practices for the purposes of supervision, checking your file for quality purposes or to deal with any complaints that may arise.
- 52) Once your matter has concluded, we will hold your files in our archive storage with our contracted provider (paper files) or on our file management systems (electronic files) for at least 6 years from the date that the matter is closed in line with our retention periods. After that period has elapsed, we will destroy your file securely and/or delete it from our electronic records. Once that has happened, your file will no longer be available.
- 53) We do not send or store any of your information outside of the European Economic Area.

### **C) IF YOU ARE A THIRD-PARTY OR THE OTHER SIDE TO OUR CLIENTS' MATTERS**

- 54) We will receive information (including personal data) about third parties that are involved with our clients' matters. For example, opponents to our clients in litigations matters, the buyer/seller in our clients' property matters, executors and beneficiaries to a Will etc. We will primarily receive information about you from your legal representative, unless you are unrepresented and provide this to us directly.
- 55) We receive this information so that we can provide legal services to our client and therefore our legal basis for processing your information is to perform the contract that we have with our client for legal services. Your legal representative (if you have one) should have informed you of their purposes for processing personal data and explained that they would need to share your information with us to progress your matter.
- 56) We keep your information confidential and will not disclose it to third parties unless disclosure is:
  - a) Authorised by you;
  - b) Necessary for the performance of a contract;
  - c) Required by law or our professional rules;
  - d) Necessary for the purposes of our legitimate interests or those of a third-party (in other words, we have a compelling justification for the disclosure); or
  - e) Necessary to protect your vital interests or those of another person i.e. to protect a life.
- 57) During the progress of our clients' matters, we may hold your information both electronically and in paper format. We will use all reasonable measures to ensure that your information remains confidential and will advise you immediately if we believe that any of your information has been released. We have procedures in place with our staff members to ensure that your information is only seen by members of staff who have a legitimate reason for accessing your file, such as fee earners and support staff working on your file and senior members of the Legal Practices for the purposes of supervision, checking your file for quality purposes or to deal with any complaints.
- 58) Once our clients' matters have concluded, we will hold your information on our clients' files in our archive storage with our contracted provider (paper files) or on our file management systems (electronic files) for at least 6 years from the date that the matter is closed in line with our retention periods. After that period has elapsed, we will destroy our clients' files securely and/or delete it from our electronic records. Once that has happened, your information will no longer be available.

59) We do not send or store any of your information outside of the European Economic Area.

## **D) IF YOU HAVE APPLIED TO WORK FOR US**

- 60) All of the information you provide when you apply to work for us, will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.
- 61) We will not share any of the information you provide during the recruitment process with any third parties unless authorised by you or required by law. We will not store any of your information outside of the European Economic Area.
- 62) We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for. You don't have to provide what we ask for, but it might affect your application if you don't.
- 63) Our legal basis for processing your personal data is two-fold:
- a) for our legitimate interests in ensuring that we have adequate recruitment procedures and undertake the right checks to ensure that we recruit the right candidate; and
  - b) to meet our legal obligations, particularly those relating to equality and diversity.
- 64) If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment.
- 65) If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the vacancy.
- 66) Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.
- 67) Equal opportunities, gender and diversity information is retained for 6 months following the closure of the campaign whether you are successful or not.

## **E) IF YOU ARE A CURRENT EMPLOYEE OR FORMER EMPLOYEE**

- 68) We obtain your personal information for the following purposes:
- a) Contact details, including next of kin;
  - b) Bank details, including bank name, bank account name, sort code and account details;
  - c) Pension details, including personal and workplace pension details;
  - d) Tax details, including HMRC and National Insurance requirements;
  - e) Salary details, including loans attachment of earnings, student loans and child care vouchers;
  - f) Annual leave details;
  - g) Sick leave details, including medical certificates, self-certified sick leave and GP fit-notes;
  - h) Statutory requirements re maternity, paternity, adoption, shared parental pay information;
  - i) Performance details, disciplinary records, appraisals where appropriate;
  - j) Professional and other qualifications;
  - k) Employment history;
  - l) Ethnicity details;
  - m) Disability details;
  - n) Training records.
- 69) We keep your information confidential and will not disclose it to third parties unless disclosure is:
- a) Authorised by you;
  - b) Necessary for the performance of a contract;
  - c) Required by law or our professional rules;
  - d) Necessary for the purposes of our legitimate interests or those of a third-party (in other words, we have a compelling justification for the disclosure); or
  - e) Necessary to protect your vital interests or those of another person i.e. to protect a life.
- 70) Our legal basis for processing your personal data is two-fold:
- a) For our legitimate interests in ensuring that we have adequate personnel records; and
  - b) To meet our legal obligations as employers.

71) We will share your information with the following third parties:

- a) HMRC;
- b) The Legal Practices' pension provider, NEST (National Employment Savings Trust);
- c) The Legal Practices' payroll provider, IRIS Business Software Limited;
- d) The Legal Practices' IT and cloud support provider, IT Farm Limited;
- e) The Legal Practices' external accountants, Downham, Mayer & Clarke Limited; and
- f) Solicitors Regulation Authority (as applicable).

72) Employee details are held at our offices and are not transferred or stored outside of the European Economic Area.

73) Your employee file for the duration of your employment plus 6 years following the end of your employment.

## **F) YOUR RIGHTS AS AN INDIVIDUAL (OR DATA SUBJECT)**

74) If you are an individual, you have the following rights under the General Data Protection Regulation 2016 (GDPR):

- a) Right to access personal data – you can request details from us of the personal data that we hold about you;
- b) Right to object to processing – you can tell us that you want us to stop processing your personal data;
- c) Right to object to automated individual decision making including profiling – you can object to us making decisions about you solely by using a computer system without any human consideration (we do not currently do this);
- d) Right to rectification – you can ask us to correct personal data that we hold because you believe it is inaccurate;
- e) Right to erasure ('to be forgotten') – you can ask us to delete the personal data that we hold about you;
- f) Right to restrict processing – you can tell us that you only want us to use the personal data for a specific reason.

75) Please note that these rights are not absolute rights (they are not rights that will be automatically granted), as we have to consider whether there are any reasons why we cannot meet your request. For example, we will not be able to delete data that we are legally obliged to keep. We will let you know if we not able to meet your request and the reason why (where it is appropriate to disclose this information to you).

76) You also have the right to complain to the Information Commissioner's Office (ICO) if you are not happy with the way that we handle your personal data. You can contact the ICO at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by calling the ICO's helpline on 0303 123 1113.

77) Where you provide consent to us using your personal data, you are entitled to withdraw that consent at any time. You can do this by informing your file handler or contacting our designated Data Protection Compliance Manager (*para 83*).

## **G) GENERAL**

78) You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

79) If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

80) Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

81) This privacy policy is governed by and interpreted according to English law. All disputes arising under this privacy policy are subject to the exclusive jurisdiction of the English courts.

## **H) CHANGES TO THIS PRIVACY POLICY**

82) The Legal Practices reserve the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

83) The Legal Practices' Data Protection Compliance Manager for the purpose of the General Data Protection Regulation 2016, the Data Protection Act 2018 and the Legal Practices' contact with the Information Commissioners Office (ICO) is Keith Mellalieu, the Legal Practices' Compliance Officer for Finance & Administration (T: 0161 828 0600).

## I) THE LEGAL PRACTICES

84) The GLP Solicitors' practices reflected in this Data Protection Privacy Policy are:

<b>The Legal Practices:</b>		<b>Solicitors Regulations Authority ID:</b>	<b>ICO Registration:</b>
<b>GLP Solicitors (Bury)</b>	Maple House 8, Haymarket Street Bury, Lancashire	307015 BL9 0AR	Z9034906
<b>GLP (Prestwich) LLP</b> <i>also trading as</i> GLP Solicitors (Prestwich)	Portland Terrace 9, Fairfax Road Prestwich, Manchester	543409 M25 1AS	Z9034923
<b>GLP Solicitors (Pendlebury)</b>	672, Bolton Road Pendlebury Swinton, Manchester	073881 M27 8FH	Z903485X
<b>GLP Solicitors (Worsley)</b>	Formerly of: 15, Hulton District Centre Little Hulton Worsley, Manchester	403135 M28 0BA	Z9034863
<b>GLP (Manchester) LLP</b> <i>also trading as</i> GLP Solicitors (Manchester) & GLP Business	85, Chapel Street Salford Manchester	511445 M3 5DF	Z9034846
<b>GLP Solicitors (Middleton)</b>	20A, Lakeland Court Langley Middleton, Manchester	0 069836 M24 5QJ	Z9034937
<i>and</i> <b>GLP Legal Management Limited</b>	55, Queen Street Blackfriars Salford, Manchester	N/A M3 7DQ	Z9035167

85) You may contact the Legal Practices in respect of Data matters by email at: [dataprotection@glplaw.com](mailto:dataprotection@glplaw.com)

This privacy policy is reviewed regularly and was last updated in May 2018.