

Privacy Notice

Poole Dick Associates Ltd. Is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information, in accordance with the General Data Protection Regulation (GDPR).

It applies to Clients, Associations, Suppliers, Third parties and Website Users.

Poole Dick Associates Ltd. is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

1. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

2. The kind of information we hold about you

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).

There are “special categories” of more personal sensitive personal data which require a higher level of protection.

1. We may collect, store and use the following categories of personal information about you:
 1. Personal details such as name, date of birth, title, national insurance number.
 2. Contact details such as addresses, telephone numbers and email addresses
 3. Employment details such as occupation, employer, department
 4. Cookies and IP addresses if you visit our website

This list is not exhaustive and we may collect other information in the course of providing our services.

3. How is your personal information collected?

We collect information from you in person, via email, using contact forms on our website or via other digital platforms such as social media.

We may sometimes collect additional information from third parties including other parties involved in the work we are carrying out; credit reference agencies or other background check agencies.

4. How we will use information about you

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

1. Where we need to perform the contract we have entered into with our client.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

2. We may also use your personal information in the following situation, which is likely to be rare:

1. Where it is needed in the public interest (or for official purposes).

3. Situations in which we will use your personal information – the majority of situations in which we will process your personal information are listed below:

1. In order for us to carry out work as instructed by our client.
2. Allowing clients to pay their bill.
3. Setting up direct debits or standing orders.
4. To conduct the necessary checks required; ID, anti-money laundering, due diligence.
5. To comply with court orders (in contentious work)
6. For marketing purposes including running events and providing information about the services we offer.
7. Debt management.
8. To respond to and record client feedback.
9. To set up the necessary documentation and provisions with suppliers and other organisations we work with.

4. If you fail to provide personal information

1. If you fail to provide certain information when requested, we may not be able to fulfil the situations described above.

5. Change of purpose

1. We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
2. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. How we use particularly sensitive personal information

1. “Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:
 1. In limited circumstances, with your explicit written consent.
 2. Where necessary to protect the vital interests of a person who is physically or legally incapable of giving consent.
 3. Where processing relates to information which has been made public.
 4. Where processing is necessary for the establishment exercise or defence of legal claims.
2. Situations in which we will use your sensitive personal information:
 1. Where explicit consent has been provided we will request information about you from other organisations.
 2. We will use information about you as is necessary in any legal claims whether we are acting for you or you feature on the matter as an associated party.
 3. We will use any dietary requirements you provide us with to make the necessary arrangements at any events you may attend.
3. Do we need your consent?
 1. We do not need your consent if we use special categories of your personal information in accordance with this written policy. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of any contract there may be between us and you agree to any request for consent from us.

6. Information about criminal convictions

We do not envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

7. Data Sharing

We may have to share your data with third parties, including third-party service providers.

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

1. Why might you share my personal information with third parties?
 1. We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.
2. Which third-party service providers process my personal information?
 1. "Third parties" includes third-party service providers (including contractors and designated agents). The following activities are carried out by third-party service providers: to perform legal activities to progress a client's instructions including anti-money laundering and ID checks, to trace people, to provide IT services, to transfer information physically (couriers) or electronically (virtual data rooms), for marketing purposes, to process monetary payments, to archive emails and to provide referrals.
3. How secure is my information with third-party service providers?
 1. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
4. What about other third-parties?
 1. In order for us to provide our services we may share your personal information with other third-parties. For example, we may need to share your personal information with a regulator or to otherwise comply with the law.

8. Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

9. Data Retention

1. How long will you use my information for?

1. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from our Data Privacy Manager.

10. Rights of access, correction, erasure and restriction

1. Your duty to inform us of changes

1. It is important that the personal information we hold about you is accurate and current, Please keep us informed if your personal information changes.

2. Your rights in connection with personal information. Under certain circumstances, by law you have the right to:

1. Request access to your personal information (commonly known as “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. Request the restriction of processing your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. Request the transfer of your personal information to another party.

3. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data or request that we transfer a copy of your personal information to another party, please contact our Risk and Compliance Officer in writing.

4. No fee usually required

1. You will not have to pay a fee to access your personal information (or to be able to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

5. What we may need from you

1. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

6. Right to withdraw consent

1. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Privacy Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. Data Privacy Manager

We have appointed a Data Privacy Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Privacy Manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

12. Changes to this privacy notice

We reserve the right to update this privacy notice at any time and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact:

**Data Privacy Manager
Poole Dick Associates
Waterfold Park
Bury
Lancashire
BL9 7BR**