

Adams Solicitors' GDPR Policy

Introduction

Adams Solicitors ("Adams") are committed to protecting and respecting your privacy.

This policy

sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller – A controller determines the purposes and means of processing personal data.

Data processor – A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data – The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data – The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Adams Solicitors is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Adams Solicitors, 129 Mile End Road, London E1 4BG, 0207 790 2000. For all data matters contact our Data Protection Officer Markus Malik who can be reached at markus.malik@adamslaw.co.uk

3. The purpose(s) of processing your personal data

Adams use your personal data for the following purposes:

- To administer and manage our relationship with you.
- To process instructions from you representation.
- To deal with any enquiries we receive from you.
- To comply with applicable laws, regulations and rules.
- To provide you with details of our services and promotions.
- To notify you of changes to what we do.
- To make checks of credit reference agencies from time to time.
- For the purposes of recovery of a debt in case of non-payment.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by contacting our data protection officer on markus.malik@adamslaw.co.uk..

4. **The categories of personal data concerned**

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- **Identity Data** includes first name/last name/ username/marital status/ title/date of birth/gender.
- **Contact Data** includes billing address/delivery address/tenants' names, phone numbers, e-mail address/rental property address/email address/ telephone numbers.
- **Financial Data** including bank account details.
- Adams also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.
- Adams might collect and store information about criminal convictions and offences. Adams do not collect any **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).

5. **What is our legal basis for processing your personal data?**

Our legal basis for uses of your personal information may include that (a) it is necessary for our legitimate interests in operating our business and/or providing you with goods and services; and/or (b) it is necessary for the performance of contracts to which you are a party with us.

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.

6. **Sharing your personal data**

Your personal data will be treated as strictly confidential and will be shared only with third parties that perform services on our behalf, such as business partners (including printing and marketing agents, credit reference agencies and tracing agents), fraud sharing organisations and to other companies in our group, in each case within the EEA and the UK.

Adams may have to share your personal data with the parties set out below.

- Providers e.g IT and system administration services
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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

7. **How long do we keep your personal data?**

Adams will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure

of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8. **Providing us with your personal data**

Adams require your personal data as it is a contractual requirement, or a requirement necessary to enter into a contract.

9. **Your rights and your personal data**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact Markus Malik on markus.malik@adamslaw.co.uk for subject access rights.

No fee required – with some exceptions

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

Adams may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. Adams may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

Adams try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. **Transfer of Data Abroad**

Adams do not transfer personal data outside the EEA.

11. **Automated Decision Making**

Adams do not use any form of automated decision making in our business.

12. **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. **How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer on m.daragics@bonuseventus.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.