

STEWART BALFOUR AND SUTHERLAND

Privacy Policy – November 2021

This privacy policy explains how we use any personal information we collect about you when you use our services. Edington Law Limited will be a “controller” of the personal information that you provide to us when you instruct us to act on your behalf unless otherwise stated in this privacy notice.

- (i) Information supplied to us by you will be dealt with in confidence. It will only be disclosed where reasonable and necessary to carry out the work you have instructed or if we are legally required to do so.
- (ii) We fully abide by the data protection principles under the General Data Protection Regulation and any associated Act of Parliament. Your personal data held by us on any relevant filing system will not be disclosed to third parties without your consent and is available to you on request.
- (iii) We collect information about you when you first contact us or engage our services. We also collect information when you provide any information we request or which you provide voluntarily. On our website, we may collect usage information using cookies. We will hold some or all of the following personal information about you in our files, in our practice management system and on our client database: name and address; date of birth; contact telephone number(s); email address(es); National Insurance Number; financial information we require in connection with your transaction. We may also obtain additional personal information to enable us to properly provide our services.
- (iv) When you become a client of Edington Law Limited, we will collect, store and use the personal information that you provide to us in your instructions and during the course of our solicitor / client relationship.
- (v) We need to collect your personal information so that we can perform our services. We will use the information to:
 - (a) Provide you with legal advice, for example by communicating with you by email, letter and/or telephone
 - (b) Represent you as your solicitors in connection with the matter you have instructed us about
 - (c) Respond to and communicate with clients regarding your questions, comments, support needs or complaints, concerns or allegations in relation to complaints and disciplinary procedures, for example we will use your personal information to investigate your complaint and take disciplinary action
 - (d) Manage any money processed on your behalf.
- (vi) We may use your personal information in pursuit of our legitimate interests to:
 - (a) Manage our relationship with you
 - (b) Promote our services by sending communications with information for upcoming events and to keep you informed of legal developments and developments within our company
 - (c) Invite you as guests to our events, including seminars and client hospitality events
 - (d) Email you about other products and services we think may be of interest to you

We will not share your information for marketing purposes with any third party.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object

to any of the above processing, please contact us on mail@sbslaw.co.uk. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a client.

- (vii) We are under a legal obligation to process certain personal information relating to our clients for the purposes of complying with our obligations under:
 - (a) Law Society of Scotland Practice Rules
 - (b) Money Laundering Regulations
 - (c) Proceeds of Crime Act 2002
- (viii) We may be required to share personal information with statutory or regulatory authorities and organisations. Such organisations include the Law Society of Scotland, Revenue Scotland or HMRC, for the purposes of compliance with statutory obligations. We may also share personal data with our professional advisors for the purposes of taking advice.

We may employ third party suppliers to provide services including legal searches, service of documents and our own professional advisers. These suppliers may process personal data on our behalf as “processors” and are subject to written contractual conditions to only process that personal data under our instructions and to protect it. In the event that we do share personal data with external third parties, we will only share such personal data strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes. Your continued relationship with us will be evidence that you consent to our use of your personal information for these purposes.

- (ix) Your personal information is stored on our electronic filing system and our servers based in the UK and is accessed by our staff for the purposes set out above. Paper files are stored within our offices.
- (x) We keep all files and data for the minimum period recommended from time to time be the Law Society of Scotland.
- (xi) We employ third party suppliers to provide services including utilising the services of a credit reference agency (<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>)
- (xii) You can exercise any of the following rights by writing to us at Stewart Balfour and Sutherland, Kinloch Hall, Campbeltown, Argyll PA28 6DL or to any of our branch offices.

Your rights in relation to your personal information are:

- (a) you have a right to request access to the personal information that we hold about you by making a "subject access request";
- (b) if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- (c) you have a right to request that we restrict the processing of your personal information for specific purposes; and
- (d) if you wish us to delete your personal information, you may request that we do so.

Any requests will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk

Stewart Balfour and Sutherland
(updated 29/06/23)