Hughes Jenkins Solicitors understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, http://hughesjenkins.co.uk/ (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

We advise clients of this firm, to read this notice alongside our general terms and conditions which provide further information on confidentiality, data privacy etc.,.

This notice does not apply to any websites that may have a link to ours.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account” means an account required to access and/or use certain areas and features of Our Site;

“Cookie” means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;

“Cookie Law” means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

“Personal Data” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the [Data Protection Act 1998] OR [EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”)]; and
“We/Us/Our” means Hughes Jenkins, a limited company registered in Wales under company number 0535141 whose registered address is 27A and B High Street, Aberdare CF44 7AA and 5A Cordani Buildings, Gravel Lane, Blackwood NP12 1AG.

Our Date Protection Officer is Lisa Summers who is based in our Blackwood Office and can be contacted by telephone on 01495 233011 or by email lisasummers@hughesjenkins.co.uk

Our website and services are not aimed specifically at children because in legal work children are generally represented by their parent or guardians. If you are a child and need further advice or explanation about how we would use your data, please email us

What we need

The exact information we will request from you will depend on what you have asked us to do or what we are contracted to do for you. This notice is intended for clients and prospective clients only.

Under the Data Protection Act 1998 ("DPA") there are two types of personal data (personal information) that you may provide to us:

- **Personal data:** is the general information that you supply about yourself – such as your name, address, gender, date of birth and contact details.

- **Sensitive personal data:** is, by its nature, more sensitive information and may include your racial or ethnic origin, religion, health or criminal convictions.

In the majority of cases personal data will be restricted to basic information and information needed to complete ID checks. However some of the work we do may require us to ask for more sensitive information.

Sources of information

Information about you may be obtained from a number of sources; including:

- You may volunteer the information about yourself
- You may provide information relating to someone else – if you have the authority to do so
- Information may be passed to us by third parties in order that we can undertake your legal work on your behalf. Typically these organisations can be:
  - Banks or building societies
  - Panel providers who allocate legal work to law firms
Organisations that have referred work to us
Medical or financial institutions – who provide your personal records / information

Why we need it

The primary reason for asking you to provide us with your personal data, is to allow us to carry out your requests – which will ordinarily be to represent you and carry out your legal work.

The following are some examples, although not exhaustive, of what we may use your information for:

- Verifying your identity
- Verifying source of funds
- Communicating with you
- To establish funding of your matter or transaction
- Obtaining insurance policies on your behalf
- Processing your legal transaction including, providing you with advice; carrying out litigation on your behalf; attending hearings on your behalf; preparing documents or to complete transactions
- Keeping financial records of your transactions and the transactions we make on your behalf
- Seeking advice from third parties; such as legal and non-legal experts
- Responding to any complaint or allegation of negligence against us

Who has access

We have a data protection regime in place to oversee the effective and secure processing of your personal data. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Generally, we will only use your information within Hughes Jenkins Solicitors. However there may be circumstances, in carrying out your legal work, where we may need to disclose some information to third parties; for example:

- HM Land Registry to register a property
- HM Revenue & Customs; e.g. for Stamp Duty Liability
- Court or Tribunal
- Solicitors acting on the other side
- Asking an independent Barrister or Counsel for advice; or to represent you
- Non legal experts to obtain advice or assistance
- Translation Agencies
- Contracted Suppliers
- External auditors or our Regulator; e.g. SRA, ICO etc.
• Bank or Building Society; or other financial institutions
• Insurance Companies
• Providers of identity verification
• Any disclosure required by law or regulation; such as the prevention of financial crime and terrorism
• If there is an emergency and we think you or others are at risk

In the event any of your information is shared with the aforementioned third parties, we ensure that they comply, strictly and confidentially, with our instructions and they do not use your personal information for their own purposes unless you have explicitly consented to them doing so.

There may be some uses of personal data that may require your specific consent. If this is the case we will contact you separately to ask for your consent which you are free to withdraw at any time.

How do we protect your personal data

We recognise that your information is valuable and we take all reasonable measures to protect it whilst it is in our care.

We have exceptional standards of technology and operational security in order to protect personally identifiable data from loss, misuse, alteration or destruction. Similarly, we adopt a high threshold when it comes to confidentiality obligations and both internal and external parties have agreed to protect confidentiality of all information; to ensure all personal data is handled and processed in line with our stringent confidentiality and data protection policies.

We use computer safeguards such as firewalls and data encryption and annual penetration testing; and we enforce, where possible, physical access controls to our buildings and files to keep data safe.

How long will we keep your data

Your personal information will be retained, usually in computer or manual files, only for as long as necessary to fulfil the purposes for which the information was collected; or as required by law; or as long as is set out in any relevant contract you may hold with us. For example:

• As long as necessary to carry out your legal work
• For a minimum of 7 years from the conclusion or closure of your legal work; in the event that you, or we, need to re-open your case for the purpose of defending complaints or claims against us
• For the duration of a trust
Some information or matters may be kept for 16 years – such as commercial transactions, sales of leasehold purchases, matrimonial matters (financial orders or maintenance agreements etc.)

Probate matters where there is a surviving spouse or civil partner may be retained until the survivor has died in order to deal with the transferable Inheritance Tax allowance

Wills and related documents may be kept indefinitely

Deeds related to unregistered property may be kept indefinitely as they evidence ownership

Personal injury matters which involve lifetime awards or PI Trusts may be kept indefinitely

What are your rights?

Under the DPA, you are entitled to request a copy of your personal data (otherwise known as a Subject Access Request). If you wish to make a request, please do so in writing addressed to our Data Protection Officer Lisa Summers or contact the person dealing with your matter.

A request for access to your personal data means you are entitled to a copy of the data we hold on you – such as your name, address, contact details, date of birth, information regarding your health etc. This means that a Subject Access Request will not normally result in you getting a copy of your file because you are only entitled to your personal data – not the documents that contain that data.

Complaints about the use of personal data

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate further. Our Data Protection Officer is Lisa Summers and you can contact them at lisasummers@hughesjenkins.co.uk.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner’s Office (ICO).

How we collect personal data

The following are examples, although not exhaustive, of how we collect your personal information:

- Submitting an online enquiry
- Following/liking/subscribing to our social media channels
- Take part in one of the competitions or promotions we run on the website or on our social media channels
- Agree to fill in a questionnaire or survey on our website
• Ask us a question or submit any queries or concerns you have via email or on social media channels
• Post information to the our website or social media channels, for example when we offer the option for you to comment on, or join, discussions

We will not forward you any marketing material

How we protect your personal information

We will only ever use non sensitive personal information to target individuals with marketing materials; such as name, address, telephone, email, job description and previous buying behaviours. Sensitive information or specific details will never be used to target marketing communications. We may use personalisation to collect analytics to inform marketing and produce relevant content for the marketing strategy to enable it to enhance and personalise the “consumer experience”.

Thank you for taking the time to read our Privacy Policy