

THRINGS LLP PRIVACY POLICY

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1. Introduction

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your Personal Data. It also explains your rights in relation to your Personal Data and how to contact us or supervisory authorities in the event you have a complaint.

Our use of your Personal Data is subject to your instructions, the EU General Data Protection Regulation (GDPR), other relevant UK and EU legislation and our professional duty of confidentiality. We will always comply with the GDPR when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk).

2. Key terms

We, us, our	Thrings LLP trading as Thrings
Personal Data	Any information relating to an identified or identifiable individual
Special category Personal Data	Personal Data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

3. Personal Data in relation to interaction with our website

3.1 How do we collect your data?

We collect Personal Data from visitors to this website:

1. through the use of online forms, email hyperlinks and the contact us page.
2. when you e-mail us with an enquiry

The Personal Data we collect are name, address, email, telephone number, associated company (if relevant) and any other Personal Data you include.

We will always comply with the GDPR when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk).

3.2 Where your data is stored?

Hubspot is our client relationship management tool and collects and stores your Personal Data. Hubspot is a cloud based provider and more information can be found about them on their website.

3.3 How and why we use your Personal Data

We have a legitimate interest in processing your data for certain reasons i.e.

- Providing information about services
- Providing and personalising our services
- Dealing with your enquiries and requests

We will seek your consent by way of the online forms on the website to be able to use your Personal Data to send marketing materials to. This may be in relation to newsletters or events. You can update your preferences as to what information you receive at any time by selecting the preference centre at the bottom of any e-mail that you receive from us or emailing marketing@thrings.com.

You have the right to opt out of receiving any marketing materials at any time by:

- Contacting us by email to marketing@thrings.com.
- Using the 'unsubscribe' link in e-mails

4. Personal Data processed in relation to our Clients

4.1 Personal Data we collect about you

The table below sets out the Personal Data we will or may collect in the course of advising and/or acting for you.

Personal Data we will collect	Personal Data we may collect depending on why you have instructed us
<p>Your name, address and telephone number</p> <p>Information to enable us to check and verify your identity, e.g. your date of birth or passport details</p> <p>Electronic contact details, e.g. your email address and mobile phone number</p> <p>Information relating to the matter in which you are seeking our advice or representation</p> <p>Your financial details so far as relevant to your instructions, e.g. the source of your funds if you are instructing on a purchase transaction</p> <p>If you make a payment through our online payment system, your name, address, email and telephone number will be retained. No personal financial information is retained on our website as this service is provided by a Third Party.</p>	<p>If you are a business:</p> <p>Information provided by you about your business and other individuals (which could include some or all of the data below) in connection with any advice we provide to your business.</p> <p>If you are an individual:</p> <p>Your National Insurance and tax details</p> <p>Your bank and/or building society details</p> <p>Details of your professional online presence, e.g. LinkedIn profile</p> <p>Details of your spouse/partner and dependants or other family members, e.g. if you instruct us on a family matter or a will</p> <p>Your employment status and details including salary and benefits, e.g. if you instruct us on matter related to your employment or in which your employment status or income is relevant</p> <p>Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information, e.g. if you instruct us on an immigration matter</p> <p>Details of your pension arrangements, e.g. if you instruct us on a pension matter or in relation to financial arrangements following breakdown of a relationship</p>

Personal Data we will collect	Personal Data we may collect depending on why you have instructed us
	<p>Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs, e.g. if you instruct us on discrimination claim</p> <p>Your trade union membership, e.g. if you instruct us on discrimination claim or your matter is funded by a trade union</p> <p>Personal identifying information, such as your hair or eye colour or your parents' names, e.g. if you instruct us to incorporate a company for you</p> <p>Medical records e.g. if you have instructed us on a disability discrimination claim or they are relevant to other legal proceedings in which you are involved.</p>

This Personal Data is required from you to enable us to provide our service to you. If you do not provide Personal Data we ask for, it may delay or prevent us from providing services to you.

4.2 How your Personal Data is collected

We collect most of this information from you. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g. sanction screening providers
- from a third party with your consent, e.g.: your bank or building society, another financial institution or advisor, consultants and other professionals we may engage in relation to your matter or your employer and/or trade union, professional body or pension administrators;
- via our information technology systems, e.g.:
 - case management, document management and time recording systems;
 - through our own website
 - relevant websites and applications;
 - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV, communication systems and e-mail.
- Via other processes we have in place e.g. Reception logs

4.3 How and why we use your Personal Data

Under data protection law, we can only use your Personal Data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your Personal Data for and our reasons for doing so:

What we use your Personal Data for	Our reasons
To provide legal advice and services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify our clients and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies In particular, we are in some circumstances under a legal duty to disclose information to the National Crime Agency (NCA) or other enforcement agencies. If we make a disclosure we will usually not be able to tell you about it or the reasons for the disclosure.	To comply with our legal and regulatory obligations

What we use your Personal Data for	Our reasons
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party To comply with our legal and regulatory obligations
Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests or those of a third party
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party To comply with our legal and regulatory obligations
To keep our central records up to date including updating and enhancing client records and manage the firms business	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
Statutory returns and deal with regulatory obligations	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
Marketing to you similar services that we think might be of interests to you	For our legitimate interests (see below)
External audits and quality checks, e.g. SRA and the audit of our accounts	For our legitimate interests or a those of a third party To comply with our legal and regulatory obligations

In addition, we will only undertake the following activities having received your specific consent,

- to use your matter as part of a case study or article to promote our expertise
- to use you as a reference.

The above table does not apply to special category Personal Data, which we will only process with your explicit consent.

4.4 Marketing communications

We may use your Personal Data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services.

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

We will always treat your Personal Data with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving marketing materials at any time by:

- contacting us by email to unsubscribe or update your marketing preferences to marketing@thrings.com
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

4.5 Who we share your Personal Data with

We routinely share Personal Data with:

- professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors, expert witnesses or other experts;
- other third parties where necessary to carry out your instructions, e.g. your mortgage provider or HM Land Registry in the case of a property transaction or Companies House;
- the Courts
- credit reference agencies;
- our insurers and brokers;
- external auditors, e.g. SRA and the audit of our accounts;
- our banks;
- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. typing services, marketing agencies, document collation or analysis suppliers.

We only allow our service providers to handle your Personal Data if we are satisfied they take appropriate measures to protect your Personal Data. We also impose contractual obligations on service providers relating to ensure they can only use your Personal Data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

4.6 Where your Personal Data is held

We will store this Personal Data primarily on our Case Management System although Personal Data may also be stored in our Outlook Exchange system and on paper files.

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see 'Who we share your Personal Data with').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your Personal Data when this occurs, see below: 'Transferring your Personal Data out of the EEA'.

4.7 How long your Personal Data will be kept

We will keep your Personal Data after we have finished advising or acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data and we will retain data in accordance with our Retention and Destruction Policy, which may change from time to time.

When it is no longer necessary to retain your Personal Data, we will delete or anonymise it.

5. Personal Data processed in relation to non-Client contacts

We will collect:

- your name, address and contact details.
- any associated Company details (if you are a business contact)
- your marketing preferences and details of any services you have subscribed to
- details of any events that you have attended.
- any other information about your relationship with us.

We store this Personal Data on Hubspot which is our client relationship management tool. Hubspot is a cloud based provider and more information can be found about them on their website here.

In relation to business contacts, we consider that we have a legitimate interest to process this data because we will be providing information about our services. We will seek consent from individual contacts for the purposes of sending marketing communications.

If you attend our offices for an event or any other reason, your details may be retained in our reception logs and other attendance lists.

6. Personal Data processed in relation to other parties in client matters.

We will collect the following Personal Data in relation to the other side in Client matters:

1. Name, address and contact details
2. Other Personal Data to allow us to progress our Client's matter.

We will store this Personal Data primarily on our Case Management System although Personal Data may also be stored in our email system, Outlook Exchange and on paper files.

We have a legitimate interest in processing this Personal Data as it is required for us to properly perform our contract with our Client. In addition, on a particular matter, we may process Personal Data in relation to other third parties involved e.g. Lawyers, experts etc. This is again necessary for us to be able to advise our Clients and be able to properly perform our contract with them.

7. Personal Data processed in relation to Suppliers

We will collect:

1. Name, Business name and address and other business information
2. Financial details

Such Personal Data is necessary for the purposes of fulfilling our contract with you.

8. Transferring your Personal Data out of the EEA

It is sometimes necessary for us to share your Personal Data outside the European Economic Area (EEA), e.g.:

- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the matter in which we are advising you.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all Personal Data will be secure. If you would like further information please contact us (see 'How to contact us' below).

9. How long your Personal Data will be kept (not clients)

We will not retain your data for longer than necessary for the purposes set out in this policy.

Different retention periods apply for different types of data and we will retain data in accordance with our Retention and Destruction Policy, which may change from time to time.

When it is no longer necessary to retain your Personal Data, we will delete or anonymise it.

10. Your rights

You have the following rights which you can exercise free of charge:

Access	The right to be provided with a copy of your Personal Data (the right of access)
Rectification	The right to require us to correct any mistakes in your Personal Data
To be forgotten	The right to require us to delete your Personal Data—in certain situations
Restriction of processing	The right to require us to restrict processing of your Personal Data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your Personal Data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your Personal Data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us - see below: 'How to contact us'; and
- let us have enough information to identify you (e.g. your full name, address and client or matter reference number, if you are a client);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

11. Keeping your Personal Data secure

We have appropriate security measures to prevent Personal Data from being accidentally lost, or used or accessed unlawfully. We limit access to your Personal Data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

12. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/> concerns or telephone: 0303 123 1113.

13. Changes to this Privacy Policy

This Privacy Policy was published on 17th May 2018 and last updated on 14th June 2023.

We reserve the right to amend this Privacy Policy from time to time without prior notice. You are advised to check this website regularly for any amendments.

14. How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Sophie Boxall

2 Queen Square

Bath

BA1 2HQ

sboxall@thrings.com

01225 340000

Do you need extra help?

If you would like this notice in another format (for example audio) please contact us (see 'How to contact us' above).