

## PRIVACY POLICY – DATA NOT RECEIVED FROM THE DATA SUBJECT

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### 1 Intended purposes for processing

Woodstock Legal Services take data privacy seriously. In conducting its legal work, Woodstock Legal Services receives personal data from sources other than the data subject (“you”). This policy explains what happens to any personal data we hold about you.

For the purposes of applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 (the “GDPR”)), your data will be controlled by Woodstock Legal Services Limited.

### 2 How you can contact us

If you have any questions or concerns about this Privacy Policy or how we process personal data, please contact us as follows:

Paula Hebbard

Our Director can be contacted directly here:  
[c.jermyn@woodstocklegalservices.co.uk](mailto:c.jermyn@woodstocklegalservices.co.uk)

### 3 Personal data that we collect

In order to provide our clients with legal services and for the administration of our files and records, we will be processing (using and storing) your personal data.

We collect and process the following personal data from third parties about you:

- **Identity and Contact Data**, which may include your name, address, telephone number, date of birth, marital status, living arrangements, passport number, employment history, educational or professional background, tax status, employee number, job title and function;
- **Information relevant to our legal advice**, which may include personal data relevant to any dispute, grievance, County Court Judgments, bankruptcy, investigation, arbitration, or other legal advice we have been asked to provide to our client;
- **Sensitive personal data**: In the course of our legal services, we may represent our clients in legal matters that require us to collect and use sensitive personal information relating to you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life and sexual orientation or details of criminal offences, or genetic or biometric data).

## 4 How we obtain personal data about you

We may collect or receive your personal data in a number of different ways:

- **Our clients** - in some circumstances, our clients provide us with data about individuals, for example because they are in dispute with that individual;
- **Enquiry agents** - where we use enquiry agents to trace people for the purposes of collecting debts, resolving disputes or conducting litigation with one of our clients; or
- **Publicly available sources** – where we use sources such as the electoral roll, LinkedIn, Google and Facebook to obtain contact details and help keep the information that we hold about you up to date and accurate.
- **Property Managers, Lettings Agents and Referencing Companies** – often our clients are property professionals, or our client has a property professional appointed on their behalf to manage the property. Information will be provided to us that is held on their file.

## 5 How we use your personal data

The table below explains how we use your data and the legal grounds on which we rely when we do so.

How we use your data	Examples	Legal grounds for processing your data
To provide our legal services to our clients and conduct our business	Performing legal services	Legitimate interests
To identify your address and other contact details	Contacting enquiry agents to obtain your current address for the purposes of debt collection, dispute resolution and litigation	Legitimate interests
To fulfil our legal and regulatory obligations and to manage our risks	Protecting our firm from the risk of money laundering, terrorist financing  Complying with sanctions and anti-bribery legislation  Complying with our regulatory reporting obligations	Legal obligations  Legitimate interests

## 6 Recipients of your personal data

In addition to our firm we may, when required and necessary, share your personal data with other organisations. Depending on the work we are undertaking for our clients the other organisations may include:

- Our firm's 'data processors' who are contractors from whom we obtain operational services including IT support, message-taking, typing and secretarial support, costs draftsmen, secure document storage and shredding.

- Other ‘data controllers’ that provide professional or commercial services, such as Counsel, other solicitors, accountants, surveyors, enforcement agents, and estate and letting agents.
- Providers of insurance, financial and banking services to our firm.
- HMRC, HM Courts & Tribunals Service, HM Land Registry, Councils and other national and local government bodies.
- Companies providing services for money laundering and terrorist financing checks, credit risk reduction and other crime prevention purposes and companies providing similar services including financial institutions, and credit reference agencies and regulatory bodies with whom such information is shared;
- The Solicitors Regulation Authority, the Information Commissioner’s Office (ICO) and organisations involved with the preparation, assessment and certification of quality standards for which our firm is seeking or maintaining accreditation.

All of the above are located in the UK.

## **7 Transferring your personal data overseas**

We may transfer your personal data to an organisation in the European Economic Area, where they have the same standards of security as the UK. We will never transfer your personal data to an organisation outside the UK or the EEA.

## **8 How long we keep your personal data**

We will retain your personal data for as long as is necessary to fulfil the purpose for which the data was collected and any other linked purpose (for example, certain details and correspondence relating to transactions in respect of which we have provided legal services may be retained by us until the time limit for claims related to the transaction has expired, or in order to comply with our regulatory obligations regarding the retention of that data).

Sometimes, your personal data is used for two or more purposes, in which case we will retain it until the purpose with the latest period expires, but we will stop using the data for any other purpose with a shorter period, once that period expires.

If you want to learn more about our retention periods for your personal data you may contact us at [n.boyland@woodstocklegalservices.co.uk](mailto:n.boyland@woodstocklegalservices.co.uk) for a copy of our Data Retention and Erasure Policy.

## **9 Keeping your data secure**

We are committed to ensuring that all information we hold about you is secure. In order to prevent unauthorised access or disclosure we have implemented appropriate physical, electronic and managerial procedures to safeguard and protect that information.

Other data controller recipients of your personal data are each responsible for implementing appropriate physical, electronic and managerial procedures to safeguard and protect that information, and to keep it secure.

Data processor recipients of your personal data have provided sufficient guarantees that they have implemented measures to ensure compliance with data protection regulations and to protect your rights.

## **10 Your rights in relation to your personal data**

You have a number of rights with respect to our use of your personal data. We explain below how you can exercise these rights.

### **Access**

You have the right to request a copy of the personal data that we hold about you. Please note that there are some exceptions to this right; for example, we may be legally prevented from disclosing such information to you or we may deny access if to do so would reveal personal data about another person.

### **Rectification**

You have the right to require us to update or correct any personal data that we hold about you that is inaccurate or incomplete. It is important to us that your data is up to date and we encourage you to contact us to let us know if personal data that we hold is not accurate or it changes.

### **Restriction**

Where certain conditions apply, you have the right to restrict the processing of your personal data.

### **Objecting**

You have the right to object to certain types of processing. If you would like to do this, please use the contact details below.

### **Objection to automated processing, including profiling**

You also have the right not to be subject to solely automated decisions, including profiling, which have a legal or similarly significant effect on you.

### **Porting**

This means that you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly-used, machine readable format.

### **Erase**

You have the right to ask us to erase your personal data in circumstances where the personal data is no longer necessary for the purposes for which it was collected or for other reasons, including when your personal data have been unlawfully processed.

Otherwise, we will not erase or restrict the processing of your personal data during the period in which we have a legal obligation to retain that data under the applicable Act, regulations or in common law.

## **Complain**

You have the right to make a complaint if you believe that your data protection rights have been breached.

If you are dissatisfied with our response you may complain to a supervisory authority which, in the UK, is the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. The ICO's website is at <https://ico.org.uk/>

You may also be able to seek a remedy through the courts.

## **How to exercise your rights**

You may exercise any of the rights set out above by contacting our Director at [c.jermyn@woodstocklegalservices.co.uk](mailto:c.jermyn@woodstocklegalservices.co.uk). In order to protect your personal data, you will need to provide proof of your identity such as a copy of your passport, driving license, etc.

Normally we make no charge for responding to a right of access and will endeavor to send it to you within 1 month of receipt of your request. If you notice that any of the information we send you is inaccurate or incomplete, please tell us and we will rectify it promptly.