



# Privacy policy clients.

## In this Privacy Policy the terms, 'we' or 'us' is Blaser Mills Law

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number ZA105455. Blaser Mills is responsible for your personal data (collectively referred to as 'Blaser Mills', 'we' or 'our' in this privacy notice.

**Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.**

### 1. What information we collect

We process personal information which you give us:

- As a client to provide you with legal services.
- Whilst servicing your account through our website, in writing or over the phone.
- If you request information or assistance from us.

### 2. How personal data is collected

We use different methods to collect data from and about you including through:

- Direct interactions.

This is the most usual method. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Instruct us in relation to a legal matter;
- Contact us by telephone, email or other means;
- When you attend our offices or seminars or events;
- Subscribe to our publications;
- Browse or interact with our website or enquiry about our services or request marketing to be sent to you;
- When you or your organisation contact us to market, sell or provide services to us;
- Give us some feedback.

- Automated technologies or interactions.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy on our website for further details.

- Third parties or publicly available sources.

We may receive personal data about you from various third parties as set out below:

- Identity and Contact Data from publicly available sources such as Companies House, electronic ID search agencies and the Electoral Register
- If relevant to your legal case for instance a personal injury matter, we may require to see your medical records

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**3. What personal information we process**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

This includes:

- Personal details such as your date of birth, address, National Insurance number, telephone number and email address.
- Identity information such as your passport, driving license, utility bills or national identity card.
- Credit history and records relating to you, your partner or anyone else you are financially linked with (we obtain this information from credit reference and fraud prevent agencies).
- Family, lifestyle, financial and social circumstances.
- Financial details such as your income and information about your bank accounts.
- Employment/self-employment details.
- Business and company documents

**4. Special categories of personal data**

Special categories of personal data include information about an individual's health and other categories of personal information which are closely protected.

We do not generally process such information unless you have voluntarily provided this to us, or it is relevant to the legal service you have asked us to provide you with, or where you have advised us of an issue, such as your health, which could mean that you may be classed as a “vulnerable client” i.e. due to your personal circumstances or personal characteristics you are particularly vulnerable to financial detriment. We will process sensitive information where you have provided this information to us and have agreed that we can use this information to deliver products and services to you. Where possible we shall seek to minimise the collection and use of such special categories of personal data.

**5. How we use your information**

We use your information to:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Comply with legal obligations for the prevention of financial crime and money laundering
- With your consent.

We will process your information in order to meet our contractual obligations to you, where we have a legitimate interest to do so, and where we are permitted by law or to comply with applicable laws and regulation, as set out in the table below:

PURPOSE		LEGAL BASIS	
Providing a service and internal processing			
To assess your needs and provide you with suitable products and services		<ul style="list-style-type: none"> <li>• Contractual obligation to provide you with, or a proposal including a cost estimate</li> <li>• Where special categories of personal data are processed, these are necessary to assess your needs</li> </ul>	

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To service and administer your matter including billing	<ul style="list-style-type: none"> <li>Contractual obligation</li> <li>Legitimate interests to provide and manage the service in addition to keeping our records updated.</li> </ul>
To verify the identity of our clients	<ul style="list-style-type: none"> <li>To comply with legal obligations to prevent money laundering</li> </ul>
To confirm, update and improve our client records	<ul style="list-style-type: none"> <li>To comply with legal obligations in the Data Protection legislation</li> </ul>
To provide you with any information on the services that you have requested	<ul style="list-style-type: none"> <li>To meet our contractual obligation to provide information on the services you have requested.</li> </ul>
<b>Relationship management</b>	
To manage and develop our relationship with you	<ul style="list-style-type: none"> <li>Legitimate interest to service your matter and improve our service to you</li> </ul>
To inform you of products and services that may be of interest to you, where you have chosen to be made aware of this.	<ul style="list-style-type: none"> <li>With your consent</li> </ul>
<b>Training and development</b>	
For training purposes and to improve our service to you	<ul style="list-style-type: none"> <li>Legitimate interests and legal obligation to improve our services and develop our employees</li> </ul>
<b>Complying with legal obligations</b>	
To prevent, investigate and prosecute crime, fraud and money laundering	<ul style="list-style-type: none"> <li>To comply with legal obligations for prevention of financial crime and money laundering</li> </ul>
For auditing purpose	<ul style="list-style-type: none"> <li>To comply with our legitimate interest to conduct audits</li> </ul>
If we are obliged to disclose information by reason of any law, regulation or court order	<ul style="list-style-type: none"> <li>To comply with legal obligations</li> </ul>
<b>Other</b>	
To transfer information to any entity which may acquire rights in us	<ul style="list-style-type: none"> <li>Legitimate interests for commercial interests</li> </ul>
For any other purpose to which you agree.	<ul style="list-style-type: none"> <li>With your consent</li> </ul>

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## 6. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. For example, if you provide us with your ID on one matter and then you instruct another lawyer in relation to another matter, we may use the same ID to open the second matter.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 7. How long we retain your personal information

We will retain your personal information in accordance with applicable laws. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set out above.

Our retention periods are:

Type of personal Information	Retention period
General personal data which includes your normal personal data, personal identity and personal financial data	<ul style="list-style-type: none"><li>Minimum 6 years after the end of our business relationship with you, or the end of your matter which ever comes later</li></ul>
Client Due Diligence Material which includes copies of your Passport, Driving Licence, Bank Statements and any associated documents and explanations you have given to us to prevent fraud, financial crime and money laundering	<ul style="list-style-type: none"><li>We obtain your consent to retain such documentation for the same duration as the file (as per the retention periods)</li></ul>
Special categories of personal data	<ul style="list-style-type: none"><li>6 years after the end of our relationship with you</li></ul>

Where you enquire about instructing us, or submit an enquiry, but do not formally instruct Blaser Mills, your details will be added to our database of prospective clients, which we will maintain for a period of 18 months, this will ensure that we maintain a record of your enquiry, in such instances where you return to instruct us within this timeframe.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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## 8. How we share your information

Where necessary or required we share information with:

- Regulatory authorities to comply with our legal obligations.
- Credit reference agencies/AML search providers to check your identity in accordance with our legal obligations.
- Insurers for the purpose of providing you with appropriate financial cover for an identified insurable risk, or in connection with any claim made by you against us.
- Solicitors representing other party(ies) in your matter to enable them and us to fulfil our obligations to you.
- Other Government Departments such as Local Authorities and Courts to fulfil your and our legal obligations.
- Other third parties such as consultants, costs draftsman, accountants, financial advisers, mediators, translators, couriers
- Experts and Barristers required to work on your matter.
- Our Auditors and external assessment bodies to achieve and maintain any Regulatory or Quality Assurance Standards and accreditations which meet our legal obligations and enable us to provide quality legal services to you.

### Third-party links

When using our website, this may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 9. International Transfers

### We may transfer your personal data outside the European Economic Area (EEA).

If we transfer your information to other countries, we will use, share and safeguard that information as described in this Notice. To provide legal and other services, we may transfer the personal information we collect to countries outside of the EEA which do not provide the same level of data protection as the country in which you reside and are not recognised by the European Commission as providing an adequate level of data protection. We only transfer personal information to these countries when it is necessary for the services we provide you, or it is necessary for the establishment, exercise or defence of legal claims or subject to safeguards that assure the protection of your personal information, such as European Commission approved standard contractual clauses.

## 10. Information and data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

## 11. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

### Opting out

You can ask us to stop sending you marketing messages at any time by either logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or emailing [marketing@blasermills.co.uk](mailto:marketing@blasermills.co.uk) at any time.

## 12. Updates

We will keep this Privacy Policy under review and make updates from time to time. Any minor changes to this Privacy Statement will be posted on this page and we will communicate any major changes to you.

## 13. Cookies

Our website uses cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our Website).

## 14. Your rights

You have the right to request copies of your personal information. If you think any of the personal information, we hold about you is inaccurate, you may also request it is corrected or erased. You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop processing your personal information and/or to withdraw your agreement to processing based on 'consent', but this does not apply where we have other legal justifications to continue processing your data or an overriding legitimate interest.

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 fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

To process your request, we will need 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. We may also contact you to ask you for further information in relation to your request to speed up our response.

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We 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.

In relation to all of these rights, please write to us at the address below.

**15. Complaints process**

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint. You also have the right to complain to the Information Commissioner's Office - ([www.ico.org.uk](http://www.ico.org.uk)).

**16. Contact us**

You can contact us by writing to the Data Protection Officer at:

Address: 40 Oxford Road, High Wycombe, Buckinghamshire HP11 2EE

Tel No: 01494 478618

Email: [lak@blasermills.co.uk](mailto:lak@blasermills.co.uk)

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