

# Chambers Of Tam Latymer Website

## Privacy and Cookies Policy

### **PRIVACY**

CHAMBERS OF TAM LATYMER (collectively referred to as “we”, “us”, or “our” in this privacy notice) respects your privacy and is committed to protecting your Personal Data. This policy notice will inform you as to how we look after your Personal Data and tell you about your privacy rights and how the law protects you.

The most recent and relevant laws that govern the protection of Personal Data is the GDPR (General Data Protection Regulation). This privacy and cookies policy has been created with this in mind.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information about how we collect and processes your Personal Data whether it is provided by you directly through your use of our website, via emails or phone, by post, social media, or face to face, whilst purchasing, interacting with us or using our goods or services, supplying services to us or otherwise.

It is important that you read through this privacy notice together with any other relevant notice we may provide on specific occasions when were collect or processing Personal Data about you – so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Please note that our website is not intended for children and we do not knowingly collect or process data relating to children.

If you have any questions about this privacy policy, including any request to exercise a legal right, please contact us at: [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com)

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), who are the UK’s supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to address your concerns before you approach the ICO, so please contact us in the first instance that this might be relevant.

## Changes to the privacy notice and your right to rectification

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

## Third-party Links

Our website 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 that you visit.

## 2. THE CATEGORIES OF PERSONAL DATA WE COLLECT ABOUT YOU

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

Under various circumstances, we may: collect, use, store and transfer different kinds of Personal Data about you. For clarity, categories of Personal Data are grouped together as follows:

- **Identity Data** includes data such as: first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes: billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes: bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. This kind of data forms the basis of some kinds of cookies (see Cookies section at the end of this policy)
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services. This kind of data forms the basis of some kinds of cookies (see Cookies section at the end of this policy)
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Personal Data from Publicly Available Sources** including information that you have shared on a publicly available platform (e.g. such as a public Facebook page).

This list is not exhaustive and in specific instances we may collect additional data for the purposes set out within this policy.

We may also collect, use and share **Aggregated Data**, such as statistical or demographic data. **Aggregated Data** may be derived from your Personal Data but is not considered Personal Data in law; as this data does not directly or indirectly reveal your identity. For example, we may aggregate your **Usage Data** to calculate the percentage of users accessing a specific website feature. However, if we combine or connect **Aggregated Data** with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

### Special Category Data

Certain types of data about Data Subjects that are demonstrably sensitive or private, and which could be used in a discriminatory way are viewed as sensitive – and as such, identified as Special Category Data under data protection law.

When information is collected from a Data Subject, Special Category Data may be collected and processed. Special Category Data is only collected and used where it's needed to provide you with a product or service you have requested or to comply with our legal obligations.

These kinds of information are to be treated with additional care, in comparison to other forms of Personal Data. This includes stating the lawful premise such information is processed under – as well as a specific condition for processing this Special Category Data.

Sensitive Personal Data may include categories of information such as:

- Racial or ethnic origin
- Political opinion
- Religious beliefs (or similar)
- Trade union membership
- Genetic information
- Biometric information (for identification purposes)
- Physical or mental health status
- Sex life
- Sexual orientation

Information about criminal allegations, proceedings or convictions including in connection with checks against fraud or anti-money laundering registers are not Special Category Data but is covered under the GDPR and special measure apply to this type of information.

In the tables below in Section 4, a description of Special Category Data collection and processing is included – alongside the lawful premise and further basis for processing special category data and further relevant information, as necessary.

#### If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested; we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods and services). In this case, we may have to cancel a product or service you have with us – but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect Personal Data from you and about you, including:

- **Direct interactions.** 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:
  - apply for or use our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment (e.g. to display web pages properly on your device), browsing actions and patterns (e.g. to inform optimizations to our website). We collect this personal data by using cookies, please see below for further details on how we use cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may share and receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
  - (a) analytics providers such as Google based outside the EU;
  - (b) advertising networks; and
  - (c) search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

In each case of the above, we will alert you when the GDPR legally requires us to do so.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your Personal Data when the law allows us to do so. Most commonly, we will use your Personal Data in the following circumstances:

- 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)
- Where we need to comply with a legal or regulatory obligation
- When you have provided fully informed and freely given consent

Generally, we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending direct marketing communications to you (e.g. via email or text message). In this event, you have the right to withdraw consent to marketing at any time by contacting us at [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com)

#### **Purposes for which we will use your Personal Data**

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us at [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com) if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new client including to conduct client due diligence and conflict checks when on-boarding a new client.	(a) Identity (b) Contact	Performance of a contract with you
To comply with our legal and regulatory obligations, including data protection, anti-financial crime, complaints handling, information security	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary to comply with a legal obligation
To process and deliver your order and/or deliver our services including:  (a) to provide legal advice and related relevant services;  (b) to manage and administer our business relationships, including to communicate with our clients, their employees and representatives;  (c) to manage billing and manage payments, fees and charges and to keep records;  (d) Collect and recover money owed to us;	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which, for example, will include:  (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how

(b) Asking you to leave a review or take a survey	Communications	customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Positive opt-in consent  Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer, provide, conduct and protect our business (including provision of our goods and/or services) and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (c) Financial (d) Transaction (e) Marketing and Communications	Necessary for our legitimate interests (for running our business, provision of our goods and/or services (directly or on behalf of a third party), provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences. This includes monitoring and recording your use of our website	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
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### Purposes For Which We Use Your Special Category Data

There may be instances where we will collect and process Special Category Personal Data. In such an event, as a Data Controller or Data Processor, we are obligated to provide a description of these activities including the basis upon which Special Category Data is processed. Below is a table which broadly outlines such activity.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>	<b>Basis for processing special category data</b>
To provide you with our legal services	a. Racial or ethnic origin b. Political opinions c. Religious or philosophical beliefs d. Trade union membership e. Genetic data f. Biometric data g. Data concerning health h. Data concerning sex life or sexual orientation	1. Performance of a contract with you 2. Positive opt-in consent 3. Legal Obligation 4. Necessary for our legitimate interests	1. Article 9 (2) a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in <a href="#">paragraph 1</a> of Article 9 of the GDPR may not be lifted by the data subject. 2. Article 9(2) f) processing is necessary for the establishment, exercise or



			defence of legal claims or whenever courts are acting in their judicial capacity.
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**A lawful basis includes:**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com)

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Marketing**

We may use your Personal Data for electronic marketing purposes (only with your express opt-in consent or if we have a legitimate interest such as to develop and carry marketing activities and to show you information that is of interest to you, based on our understanding of your preferences) and may send you postal mail to provide the latest updates from us.

We may aim to update you about services which are of interest and relevance to you as an individual.

You have the right to opt-out of receiving promotional communications you receive from us at any time by:

- Clicking “unsubscribe” links on any promotional email you receive

Contacting us directly at [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com)

Your Personal Data will only be used for marketing purposes after you have provided positive opt-in consent.

### Third-party marketing

We may share your information with a third-party for our marketing purposes (e.g. a CRM provider). Such a Data Processor will only act upon our written instructions, for purposes you have expressly agreed to.

### Opting out

If you are a recipient of our marketing you can ask us or third-parties to stop sending you marketing messages at any time by contacting us at [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com)

Should you opt-out of any marketing messages that you receive, this will not apply to Personal Data provided to us under other lawful premises e.g. collection and processing to perform a contract or take steps to enter into a contract, or legitimate interests. Such premises are subject to their own relevant agreements.

### 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com)

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.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your Personal Data and/or Special Category Data with parties set out below for the purposes set out in the table in Section 4 above.

- **External third-parties** such as: consultant, agents and service providers acting as Data Processors who are working on our behalf such as: service providers helping us to delivery our goods and/or services; providers of IT and system administration services; professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services; HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances; the police and or law enforcement agencies to help them perform their duties, or with others if we have to do this by law or under a court order.

- **Third-parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.** Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions. Such third-parties will be required to have a contractual agreement with us, and act only upon those written instructions therein. They will be required to demonstrate that they have attained a suitable level of information security and meet the standards of GDPR in accordance to their role as a Data Processor/Sub-processor.

#### Internet-based transfers

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our website via third party networks; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 6. INTERNATIONAL TRANSFERS

The majority of Personal Data is processed in the UK and EEA and we do will not typically transfer Personal Data outside of the EEA. However, on certain occasions we may be required to do so and will only do so in compliance with the conditions set out in the GDPR, which are intended to ensure that the level of protection guaranteed to Data Subjects is not undermined when their Personal Data is transferred to a third country.

In such instances, we will ensure that appropriate safeguards are in place such as the approved Model Clauses or the EU/US Privacy Shield and/or, if required, we have your explicit consent. We shall ensure that the recipient is: capable, willing and legally compelled to fulfil the standards obligated by GDPR.

This includes ensuring that the following appropriate measures are in place:

- information security (e.g. encryption, network security, etc.)
- organisational measures (e.g. training and confidentiality measures)
- limiting processing to instructions within a written agreement

- ensuring we can review and audit the Sub-processor's ability to comply on an ongoing basis
- the application of further proportionate measures in cases where Special Category Personal Data is transferred to countries outside the EEA.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an authorised 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 access and process the material.

In such cases, these individuals will only process your Personal Data on our instructions and they are subject to a duty of confidentiality. Under GDPR we operate on a premise of "Data Protection by Design" and, as such, factor in protection of Personal Data by default into all of our business activities.

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 legal required to do so.

## **8. DATA RETENTION**

How long will we use and hold your Personal Data

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it is collected; furthermore, including the purposes of satisfying any: legal, accounting or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data; the potential risk from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal data, whether we can achieve such purposes through other means, and applicable legal requirements.

In some circumstances you can ask us to delete your Personal data, see "*Request erasure*" below for further information.

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.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request a transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw

your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at: [gdpr&privacy@latymerchambers.com](mailto:gdpr&privacy@latymerchambers.com)

No fee usually required

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 certain circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of the 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.

Time limit to respond

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.

## 9. COOKIES

Our use of cookies

One type of personal data we collect and process are cookies, these falls under the “Usage” and “Technical” categories of Personal Data described in Section 2 above. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer’s hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site, or experience limited or incomplete functionality.

## 10. Updates to this policy

To employ “data protection by design” principles moving forward this policy will be routinely reviewed and updated to ensure that Data Subjects’ Personal Data is subject to appropriate collection, processing storage and safeguards.

As a Data Subject you will be notified to any further amendments to this policy which result in substantial effects to your rights.

## 11. Important contacts

If you would like to contact a representative at our organisation in relation to: this agreement, your Personal Data, or to assert any of your rights, please contact:

Ms Kertu Hill  
[info@latymerchambers.com](mailto:info@latymerchambers.com)

Chambers of Tam Latymer  
Temple Chambers  
3-7 Temple Avenue  
London  
EC4Y 0DA

Our contact will endeavour to get back to you as soon as possible and legally obligated time limits.

If you would like to contact a supervisory authority for any reason in relation to the above, please contact the Information Commissioner's Office (ICO) [here](#).