

## Privacy Policy

This privacy policy sets out how WMB Law Ltd uses and protects any information that you give WMB Law Ltd when you use this website. WMB Law Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

We ask you to consent to us receiving your personal data only because it is needed to provide services you have enquired about or to respond to your requests for information.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

### Information gathering technologies

We may store some information (commonly known as a 'cookie') on your computer when you look at the site. This information facilitates your use of our website and may, for example, be used to ensure that you do not need to re-enter your details every time you visit it. If you are uncomfortable with our use of cookies you can disable them by changing the settings on your browser, but please note that if you disable them it may affect some functionality on the site. This includes Google Analytics' who require us to state the following-

"This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above."

We reserve the right to use other tracking technologies in the future.

We may automatically collect non-personal information about you such as the type of internet browsers you use or the website from which you linked to our site. You cannot be identified from this information and it is only used to assist us in providing an effective service on this website.

### Data Protection

We take your privacy seriously. Please read this data protection information 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.

When we use your personal data, we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

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### Key terms:

We, us, our -  
Our Data Protection Manager -

WMB Law  
Steven Meredith - [stevenm@wmblaw.co.uk](mailto:stevenm@wmblaw.co.uk)

Personal data -

Any information relating to an identified or identifiable individual/person

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

### Personal data we collect about you

The table below sets out the personal data we sometimes collect in the course of advising and/or representing you

#### Personal data we will collect

#### Personal data we may collect depending on why you have instructed us

Your name, address and telephone number,

Your National Insurance and tax details

Information to enable us to check and verify your identity, e.g. your date of birth or passport details

Your bank and/or building society details

Digital contact details, e.g. your email address and mobile phone number

Details of your spouse/partner and dependants or other family members, e.g. if you instruct us on a family matter or a will

Information relating to the matter in which you are seeking our advice or representation

Your employment status and details including salary and benefits, if relevant to your matter

Information to enable us to undertake a credit or other financial checks on you  
Your financial details so far as relevant to your instructions, e.g. the source of your funds if you are instructing on a private paying basis

Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information if relevant to your matter

Details of your pension arrangements if relevant to your matter

Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data) if relevant to your matter

Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs if relevant to your matter

Your trade union membership if relevant to your matter

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Your medical records, e.g. if we are acting for you in a matter that requires medical evidence.

This personal data is required 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.

### How your personal data is collected

We collect most of this information from you directly. 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.:
  - sanctions screening providers;
  - credit reference agencies;
  - client due diligence providers;
  - the police, crown prosecution service and HM court service
  - CafCASS and Social Services
- 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;
  - your employer and/or trade union, professional body or pension administrators;
  - your doctors, medical and occupational health professionals;
  - HM Prison authorities
- via our website—we use cookies on our website
- via our information technology (IT) systems, e.g.:
  - case management, document management and time recording systems;
  - reception logs;
  - automated monitoring of our websites, computer networks and connections, CCTV, communications systems, email and instant messaging systems; such as Skype or SMS

### 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, some relevant examples are:

- 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
- where 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

To provide legal services to you

#### Our reasons

For the performance of our contract with you or to take steps at your request before entering into a contract

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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	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering internet and security use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a 3rd party, i.e. to be as efficient as we can
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information 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 3rd party, i.e. to be as efficient as we can
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you  To comply with our legal and regulatory obligations
Updating client records	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, e.g. making sure that we can keep in touch with our clients about existing and new services

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Statutory returns	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, e.g. to make sure we are following our own internal procedures and working efficiently
Marketing our services to: –existing and former clients –third parties who have previously expressed an interest in our services –third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former clients
Credit reference checks via external credit reference agencies	For our legitimate interests or a those of a third party, i.e. for credit control and to ensure our clients are likely to be able to pay for our services
External audits and quality checks, e.g. the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

### Promotional communications

We may use your personal data to send you updates by email or post about legal developments that might be of interest to you and/or information about our services, including any new services that we may be offering.

We have a legitimate interest in processing your personal data for promotional purposes (see above ‘How and why we use your personal data’). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us by email
- 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.

### 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 or other experts;

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- other third parties where necessary to carry out your instructions, e.g. your mortgage provider or HM Land Registry in the case of a probate or ancillary relief;
- credit reference agencies;
- our insurers and brokers;
- external auditors, e.g. in relation to the audit of our accounts;
- our bank;
- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. photocopying services, marketing agencies and document collation;

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.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

### Where your personal data is held

Information may be held at our offices, third party agencies, service providers, representatives and agents as described above.

### 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. Further details on this are available in our client care letter/terms of business.

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

### Transferring your personal data out of the EEA

To deliver services to you, 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 transfers are subject to special rules under European and UK data protection law.

### **Your rights**

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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
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, eg 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, eg 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. <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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

- complete a data subject request form—available from our Data Protection Manager or
- email, call or write to our Data Protection Manager—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*);
- 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.

### 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

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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.

### 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 [ico.org.uk/concerns](http://ico.org.uk/concerns) or telephone: 0303 123 1113.

### 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: [info@wmblaw.co.uk](mailto:info@wmblaw.co.uk) or 01952 291100

### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [info@wmblaw.co.uk](mailto:info@wmblaw.co.uk). We



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will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

You may request details of personal information by making a subject access request which we hold about you under the Data Protection Act 2018 and General Data Protection Regulations. If you would like a copy of the information held on you or information about making a subject access request please write to WMB law Ltd Kingsland House, Stafford Court, Telford TF3 3BD.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

### **Your Rights**

This privacy policy, together with our website usage policy, fulfils our obligation to tell you about the ways in which we use your information when you use this website.

You have the right to ask us for a copy of any personal data that we hold about you. This is known as a "Subject Access Request". Except in exceptional circumstances (which we would discuss and agree with you in advance), you can obtain this information at no cost. We will send you a copy of the information within 40 days of your request.

If any of the information that we hold about you is inaccurate, you can either:

- Contact us on 01952 291100
- Contact us via email at [info@wmblaw.co.uk](mailto:info@wmblaw.co.uk)

### **Opt in**

Unless you specify otherwise, sending an email, purchasing a service, submitting a question or comment or registering for a newsletter or event on this website automatically opts you in to our promotional mailing list. You agree that WMB Law Ltd shall be free to send you from time to time additional product or company information, including newsletters, product advertisements and / or announcements. Each newsletter, advertisement etc will also provide an opportunity for you to opt out at any time. We will never sell or disclose your email address to anyone.

After 25th May 2018, you can request that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days. For further information, please contact 01952 291100 or alternatively, please contact us via email at [info@wmblaw.co.uk](mailto:info@wmblaw.co.uk).

The lawful basis for continued use of your data for processing and for the purposes listed above is with 'consent'. This is identified as the lawful basis and you have the right to withdraw your consent at any time.

Another lawful basis of processing your data for the purposes listed above is that it has been deemed legitimate.

### **Option to Opt-Out**

If you no longer wish to receive any form of mailings from us including seminar invitations please email your request to [info@wmblaw.co.uk](mailto:info@wmblaw.co.uk).