

# Privacy

Lombards is a law firm, providing employment law advice. We are committed to safeguarding your privacy and protecting your personal data.

Our privacy policy sets out how Lombards looks after your personal data and what your privacy rights are.

Your use of our website and provision of information through enquiries, obtaining instructions and throughout the services provided by Lombards will constitute your acknowledgement of the terms of our privacy policy, below.

For ease of navigation, we have provided links to specific areas. Alternatively, you can download a printable version of this policy by clicking [here](#).

We keep our privacy policy under regular review.

## Scope

The privacy policy provides you with information on how Lombards collects and processes personal data when you make enquiries, when we obtain instructions and throughout the provision of services, including any data you may provide through the use of this website.

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.

## Controller

We are the controller responsible for this website and for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below:

Full name of legal entity: Lombards Law Limited

Name of DPO: Matt Gingell

Email address: [mg@lombardslaw.com](mailto:mg@lombardslaw.com)

Postal address: 68 Lombard Street, London, EC3V 9LJ

Telephone number: [0203 797 1264](tel:02037971264)

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

## Data we collect

Personal data 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes 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 services provided by 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.
- 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.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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

Special category data refers to sensitive information such as racial or ethnic origin, religious and philosophical beliefs, genetic data, data concerning health and sexual orientation. We will only process special category data in permitted circumstances, such as when we have your explicit consent.

#### Failure to provide personal data

Where we need to collect personal data by law, or for the provision of services, and you fail to provide that data when requested, we may not be able to carry out the services. We will notify you if this is the case at the time.

#### How we collect data

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

Direct interactions: You may give us your Identity Data, Contact Data 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:

- contact us for advice and make enquiries;
- instruct us to act on your behalf;
- provide us with information throughout the services;
- create an account with us or on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; and/or
- give us feedback or contact us, generally.

Automated technologies or interactions: As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our *cookie policy* for further details.

Third parties or publicly available sources: We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

1. analytics providers such as Google based outside the EU;
2. advertising networks based inside the EU; and
3. search information providers based inside the EU.

#### How we use data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need the personal data to perform the services.
- 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 obligation.

Legitimate Interest means the interest of our firm in conducting and managing the business to enable us to give you the best service. 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.

We do not, generally, rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below a table of description of the ways we use your personal data and the legal bases.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose	Data Types	Lawful and Legitimate interest
New enquiries	(a) Identity (b) Contact	Necessary for legitimate interests (availability of services)
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you

To provide the services including: (a) The provision of legal advice (b) Manage payments, fees and charges (c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)
To administer and protect our law firm and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) 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 and to grow our business)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients looking for our services, to keep our website updated and relevant and to develop our business)
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 (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Cookies: You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

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.

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.

### Disclosures

We may share your personal data with the parties set out below:

- Internal Third Parties – companies associated with Lombards acting as joint controllers or processors and/or providing IT and system administration services.
- External Third Parties – service providers acting as processors who provide IT and system administration services, professional advisers acting as processors or joint controllers including solicitors, barristers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services, HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- 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 privacy 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.

### 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.

### Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or possible litigation.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being our client.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will 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.

### Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- Request access to your personal data.

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 your personal data.

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 your personal data.

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) If you want us to establish the data's accuracy (ii) Where our use of the data is unlawful but you do not want us to erase it (iii) 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 (iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it

- Request transfer of your personal data.

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.

Right to withdraw consent.

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.

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 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.

Time limit to respond: We try to respond to all legitimate requests within one month. Occasionally it could 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.

