

Privacy notice

What is this?

1. When you deal with **Joseph A Jones & Co** you trust us with your information. We take privacy seriously and we are committed to protecting the data you provide to us.
2. This notice explains when and why we collect personal data about you, how this data is used, the conditions under which it may be disclosed to others and how it is kept secure.
3. This notice may change from time to time so please revisit this page occasionally to ensure that you are happy with any changes.

Who we are

4. We are **Joseph A Jones & Co LLP** of **6 Fenton Street Lancaster LA1 1TE** trading as **Joseph A Jones & Co**. We are a limited liability partnership, registered with Companies House under company number OC403120. Joseph A Jones & Co is the controller of your personal data (under the UK General Data Protection Regulation & the Data Protection Act 2018) when you engage it to provide services to you; this means that Joseph A Jones & Co decides why and how your personal data is processed. Joseph A Jones & Co is registered with the Information Commissioner under registration number Z9054792. (The Information Commissioner can be contacted at The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Telephone: 0303 123 1113. Fax: 01625 524510. Website: www.ico.org.uk)
5. Where this policy refers to 'Joseph A Jones & Co', 'we', 'our' or 'us' below, unless it mentions otherwise, it is referring to the particular company that is the controller of your personal data.

What information will we collect?

6. We will only collect information from you that is relevant to the matter that we are dealing with, in particular we may collect your contact details, identification information, financial information, employment information and/or business information and details of your family/lifestyle and social circumstances. This is defined as 'personal data'. We may also collect 'special categories of personal data' which could include information on your physical or mental health, racial or ethnic origin, religious beliefs or beliefs of a similar nature, criminal convictions and sexual orientation.
7. If you are a client, please note that your provision of documents for identity verification purposes is necessary for us to comply with our legal and statutory obligations. Failure to provide these documents will result in our being unable to undertake identity verification as required by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and, subsequently, we will not be able to act for you or the organisation instructing us, as applicable.

How we collect your personal data

8. We may collect and process the following information about you in the following ways:
9. **Information that you give to us** eg. You may provide information about yourself when you make an enquiry to **Joseph A Jones & Co** or ask us to provide legal services to you, or when entering information via our website, opt-in/consent forms, or by communicating with us during the course of any matter.
10. **Information we receive from other sources** eg

10.1 *From other professionals* eg We may receive information about you from third parties such as other law firms, accountants, estate agents and other professional advisers.

10.2 *From financial institutions*

Banks, building societies and finance companies, who are clients of ours or from whom we are given or request information, where you are their customer/debtor.

10.3 *From clients acting in a representative capacity*

- Personal representatives, attorneys, trustees, deputies and litigation friends who may provide us with information in connection with a matter, whether non-contentious or not, in which we are acting for you or a client.
- Friends, family members or colleagues who may provide information about you as part of the work we undertake, for example where you are or may be:
 - a beneficiary of an estate or trust;
 - appointed by them in some representative capacity, such as attorney;
 - a party in or a witness to a dispute.
- From regulatory bodies
 - Regulatory bodies when making regulatory enquiries;
 - The police when making enquiries into potential criminal offences.
- From introducers and referrers
 - Professional advisers who may refer your matter to us;
 - Any other introducer of a matter to us.

Please be assured that any information received will be treated confidentially at all times and only used where necessary.

11. We may supplement the personal data collected about you with information from publicly available sources, such as information to validate your identity or address, or to perform a credit check.

Type of personal data we process about you

12. As a legal practice dealing with cases and matters, we may process a range of personal data about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers (please note that not all categories may be applicable to you):

Category	Personal data included in this category
Banking/billing	Information used to send/receive funds to/from you or that appears on your bills
Behavioural	Your activities, actions and behaviours
Biographical	Your life experiences and circumstances
Cardholder	Your payment card details
Contact	Information that can be used to address, send or otherwise communicate a message to you (i.e. email address, postal address, employer name and job title)
Correspondence	Information contained in our correspondence or other communications with you or about you, about our products, services or business

Employment	Your previous, current or future employment details
Identification	Information contained in a formal identification document or social security or other unique reference relating to you
Legal	Information relating to legal claims made by you or against you or the claims process
Special categories of personal data	Your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, any personal data that relates to your health, sex life, sexual orientation or criminal offences or records or any genetic or biometric data about you

Basis for processing

- 13. The basis on which we process your personal data is one or more the following:
 - 13.1 Where it is necessary for the performance of our contract with you.
 - 13.2 Where it is necessary for us to comply with a legal obligation.
 - 13.3 Where it is in our legitimate interests to do so.
 - 13.4 Where you have given consent for us to do so. Please note that you may withdraw your consent at any time by contacting Jennifer Sammons (see Section 32 below for contact details).
 - 13.5 Where it is in the vital interests of the individual.
- 14. The basis on which we process any special categories data is one or more of the following:-
 - 14.1 It is necessary for the provision of legal advice.
 - 14.2 It is in your vital interests.
 - 14.3 You have given us your consent. Please note that you may withdraw your consent at any time by contacting Jennifer Sammons (see Section 32 below for contact details).

How will we use your information

- 15. We may use your information for the following purposes:
 - 15.1 Provision of legal services including advising and acting on behalf of clients.
 - 15.2 Promotion of our services.
 - 15.3 Maintaining accounts and records.
 - 15.4 Supporting and managing staff.

Sharing your information

- 16. Under our Codes of Conduct there are very strict rules about who we can share your information with and this will normally be limited to other people who will assist with your matter such as other law firms, accountants, counsel, expert witnesses, medical professionals, other professional advisers and courts.
- 17. Where you authorise us to do so we may also disclose information to your family or representatives.
- 18. Our work for you, or a client, may require us to provide information to third parties who will use your information for the purposes of providing services to us or directly to you on our behalf. Such third parties may include insurers or IT support or debt collection agencies, for example.
- 19. Where we are engaged by a third party, such as a bank or lender in connection with your contract with them, we may share information with that third party about the progress of the case.
- 20. Any third party to whom we disclose information about you will be under an obligation to keep your information secure and not to use it for any purpose other than that for which it was disclosed unless you agree with them otherwise.

Where is your data stored?

21. Your personal data may be kept in physical form either at our business premises or at an external storage facility provided by a third-party supplier. Your personal data may also be stored electronically on our secure servers or on secure third party ('cloud') servers, which are located within the UK and the European Economic Area (EEA).

How long will we keep your personal data for?

22. If we collect your personal data, the length of time for which we retain it is determined by a number of factors including the type of data, the purpose for which we use that data and our regulatory and legal obligations attached to its use. We do not retain personal data in an identifiable format for longer than is necessary.
23. More information is set out in our Data Retention Policy which is available on request from Jennifer Sammons (see Section 32 below for contact details).

Your rights

24. *Right to be informed*

You have the right to receive the information set out in this statement on how, when and why your information is collected, processed and stored.

25. *Accessing your personal data*

You have the right to ask for a copy of the data that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal data in certain circumstances but we will explain why we are unable to provide the data.

26. *Correcting and updating your personal data*

The accuracy of your data is important to us. If you change your name or address/email address, or you discover that any of the other data we hold is inaccurate or out of date, please contact us using the details at the end of this policy.

27. *Withdrawing your consent*

Where we rely on your consent as the legal basis for processing your personal data, you may withdraw your consent at any time by emailing Jennifer.sammons@jajsolicitors.co.uk (please use 'Withdrawal of consent' as the subject heading of your email). Please note that if you withdraw your consent, our use of your personal data before you withdraw your consent is still lawful.

28. *Objecting to our use of your personal data and automated decisions made about you*

Where we rely on our legitimate interests as the legal basis for processing your personal data, you may object to our using your personal data for these purposes by emailing or writing to us at the address at the end of this policy. If we agree that your objection is justified in accordance with your rights under data protection legislation, we will permanently stop processing your data for those purposes. Otherwise, we will provide you with our justification as to why we have to continue processing your data.

29. *Erasing your personal data or restricting its processing*

In certain circumstances, you may ask for your personal data to be removed from our systems by emailing or writing to us at the address at the end of this policy. Provided we do not have any continuing lawful basis to continue processing or holding your personal data, we will make reasonable efforts to comply with your request. You may also ask us to restrict processing your personal data where you believe our processing is unlawful, you contest its accuracy, you have objected to its use and our investigation is pending, or you require us to keep it in connection with legal proceedings. We may only process your personal data while its processing is restricted if we have your consent or are legally

permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

30. *Transferring your personal data in a structured data file*

Where we rely on your consent as the legal basis for processing your personal data or have to process it in connection with your contract, you may ask us to provide you with a copy of that data in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form. You can ask us to send your personal data directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal data in certain circumstances but we will explain why we are unable to provide the data.

31. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal data. Except in rare cases, we will respond to you within 30 days from either (i) the date that we have confirmed your identity; or (ii) where we do not need to do this because we already have this information, from the date we received your request.

Who can you complain to?

32. The person responsible for data protection at Joseph A Jones & Co is Jennifer Sammons. Please direct any queries about this policy or about the way we process your personal data to her at Joseph A Jones & Co, 6 Fenton Street, Lancaster LA1 1TE or by email to jennifer.sammons@jajsolicitors.co.uk. If you would prefer to speak to us by phone, please call 01524 63371. Similarly if you are unhappy about the way that we have responded to your request.
33. If your complaint remains unresolved, you have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal data. Please visit the ICO's website (ico.org.uk) for further details.