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Introduction

Welcome to Francis Winand's freelance solicitor privacy policy.

I respect your privacy and am committed to protecting your personal data. This privacy policy will inform you as to how I look after your personal data when you visit my website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who I am

Purpose of this privacy policy

This privacy policy aims to give you information on how I collect and process your personal data through your use of this website, including any data you may provide when you enquire about my services, whether through this website or directly.

This website is not intended for children and I do not knowingly collect data relating to children.

Controller

Francis Winand is the controller and responsible for your personal data (referred to as "I", "me" or "my" in this privacy policy).

If you have any questions about this privacy policy or my privacy practices, please contact me using the details set out below.

Contact details

Full name: Francis Winand

Email address: office@franciswinand.co.uk

Postal address: Parsons Green House, 27 Parsons Green Lane, London SW6 4HH

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). I would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact me in the first instance.

Changes to the privacy policy and your duty to inform me of changes

I keep my privacy policy under regular review.

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your relationship with me.

Third-party links

This 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. I do not control these

third-party websites and am not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy policy of every website you visit.

2. The data I collect about you

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).

Through your personal interaction with me, I may collect, use and store different kinds of personal data about you which I 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, home address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of services provided by me.
- **Usage Data** includes information about how you use my services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from me and your communication preferences.

I do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do I collect any information about criminal convictions and offences.

If you fail to provide personal data

Where I need to collect personal data by law, or under the terms of a contract I have with you, and you fail to provide that data when requested, I may not be able to perform the contract I have or am trying to enter into with you. In this case, I may have to cancel a service, but I will notify you if this is the case at the time.

3. How is your personal data collected?

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

- **Direct interactions.** You may give me your Identity, Contact and Financial Data by corresponding with me by post, phone, email or otherwise. This includes personal data you provide when you:
 - (a) apply for my services; or
 - (b) give me feedback or contact me.
- **Third parties or publicly available sources.** I may receive personal data about you from various third parties and public sources, for example in order to:
 - (a) comply with my professional obligation to confirm your identity and address;
 - (b) comply with my obligations under the money laundering and other similar regulations; and

- (c) provide my services to you; and

Data analytics. My website uses cookies to help with analytics. This generates reports on visits to my website, which includes server location but not identity or contact data.

4. How I use your personal data

I will only use your personal data when the law allows me to. Most commonly, I will use your personal data in the following circumstances:

- Where I need to perform the contract I am about to enter into or have entered into with you.
- Where it is necessary for my legitimate interests and your interests and fundamental rights do not override those interests.
- Where I need to comply with a legal obligation.

Purposes for which I will use your personal data

I have set out below, in a table format, a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what my legitimate interests are where appropriate.

Note that I may process your personal data for more than one lawful ground depending on the specific purpose for which I am using your data. Please contact me if you need details about the specific legal ground I am relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver my services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to me	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for my legitimate interests (to recover debts due to us)
To manage my relationship with you which will include: (a) Notifying you about changes to my 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 my legitimate interests (to keep my records updated and to study how customers use my services)

To deliver relevant website content to you and measure or understand its effectiveness	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	Necessary for my legitimate interests (to study how clients use my services and to develop them)
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Marketing

I strive to provide you with choices regarding certain personal data uses.

Promotional offers from me

I may use your Identity, Contact and Usage Data to contact you to inform you of any development of my services.

Third-party marketing

I do not share your personal data with any third party for marketing purposes.

Opting out

You can ask me to stop sending you any marketing messages at any time by emailing me using the contact details above.

Cookies

This website uses cookies to help with analytics.

Change of purpose

I will only use your personal data for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose, such as providing further services to you.

Please note that I may process your personal data without your knowledge or consent where this is required by law.

5. Disclosures of your personal data

I will not share your personal data with external third parties, except Permitted External Third Parties (see below) and except as otherwise required to do so by law.

6. Data security

I 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, I limit access to your personal data to contractors who have a business need to know and are subject to a duty of confidentiality.

I 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 I am legally required to do so.

7. Data retention

How long will you use my personal data for?

I will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which I collected it, including for the purposes of satisfying any legal, regulatory, insurance, tax, accounting or reporting requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe there is a prospect of a dispute in respect to my relationship with you.

To determine the appropriate retention period for personal data, I 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 I process your personal data and whether I can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

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

In some circumstances you can ask me to delete your data: see 'YOUR LEGAL RIGHTS' below for further information.

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

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data (see 'YOUR LEGAL RIGHTS' below).

If you wish to exercise any of these rights, please contact me.

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, I may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I could refuse to comply with your request in these circumstances.

Time limit to respond

I try to respond to all legitimate requests within one month.

9. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of my business in conducting and managing my business to enable me to give you the best service/product and the best and most secure experience. I make sure I consider and balance any potential impact on you (both positive and negative) and your rights before I process your personal data for my legitimate interests. I do not use your personal data for activities where my interests are overridden by the impact on you (unless I have your consent or are otherwise required or permitted to by law). You can obtain further information about how I assess my legitimate interests against any potential impact on you in respect of specific activities by contacting me.

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 obligation means processing your personal data where it is necessary for compliance with a legal obligation that I am subject to.

THIRD PARTIES

Permitted External Third Parties

- Service providers based in the UK who provide IT and system administration services.
- Professional advisers including lawyers, auditors and insurers based in the UK who provide consultancy, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Administrative assistants so far as is necessary to fulfil their contractual and legal obligations to me.

YOUR LEGAL RIGHTS

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 I hold about you and to check that I am lawfully processing it.

Request correction of the personal data that I hold about you. This enables you to have any incomplete or inaccurate data I hold about you corrected, though I may need to verify the accuracy of the new data you provide to me.

Request erasure of your personal data. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where I may have processed your information unlawfully or where I am required to erase your personal data to comply with local law. Note, however, that I 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 I am 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 I am processing your personal data for direct marketing purposes. In some cases, I may demonstrate that I 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 me to suspend the processing of your personal data in the following scenarios:

- If you want me to establish the data's accuracy.

- Where my use of the data is unlawful but you do not want me to erase it.
- Where you need me to hold the data even if I no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to my use of your data but I need to verify whether I have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. I 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 me to use or where I used the information to perform a contract with you.

Withdraw consent at any time where I am 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, I may not be able to provide certain products or services to you. I will advise you if this is the case at the time you withdraw your consent.