

HUGH CARTWRIGHT & AMIN PRIVACY POLICY



Who is responsible for your personal data?

Hugh Cartwright & Amin (SRA number 66896) is responsible for your personal data. For the purposes of applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 (GDPR), your data will be controlled by Hugh Cartwright & Amin.

Personal data we collect

1. **Personal and contact details**, including your name, address, telephone number, date of birth, marital status, passport number, job title, employment history, and other personal data concerning your preferences relevant to our services;
2. **Financial data**, including your bank account and other data necessary for processing payments and fraud prevention, including bank card numbers, security code numbers and other related billing information;
3. **Business information**, including information provided in the course of the contractual or client relationship between you and Hugh Cartwright & Amin, or otherwise voluntarily provided by you;
4. **Information relevant to our legal advice**, including personal data relevant to any dispute, grievance, investigation, arbitration, or other legal advice we have been asked to provide to our client;
5. **Profile and usage data**, including passwords to the Hugh Cartwright & Amin website or password protected platforms or services, your communication preferences and information about how you use our website;
6. **Physical access data**, relating to details of your visits to our premises;
7. **Sensitive personal data**: in the course of our services, we may represent you in legal matters that require us to collect and use sensitive personal information relating to you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life and sexual orientation or details of criminal offences, or genetic or biometric data).

Where we process sensitive personal information in the course of our services, we do so to assist you to establish, exercise or defend legal claims or to assist you in fulfilling the rights and obligations of applicable laws.

How do we collect your personal data?

1. When you seek legal advice from us or use any of our online client services;

2. When it is provided to us by a third party because you are the subject of, or your data is otherwise included in, legal advice we are asked to provide to that third party client, or to assist with our “know your client” checks;
3. When you correspond with us by phone, email or other electronic means, or in writing, or when you provide other information directly to us, including in conversation with our lawyers or other members of staff;
4. When you browse, complete a form or make an enquiry or otherwise interact on our website;
5. By making enquiries from your organisation, other organisations with whom you have dealings such as former employers and educational institutions, or from third party sources such as government agencies, a credit reporting agency, information service providers or from publicly available records (e.g. Companies House or HM Land Registry).

If you fail to provide personal data

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

How will we use your personal data?

We use your personal data only for the following purposes:

1. To fulfil a contract, or take steps linked to a contract, with you. This includes:
 - 1.1. to register you as a client of Hugh Cartwright & Amin;
 - 1.2. to provide and administer legal services or other services or solutions, as instructed by you;
 - 1.3. to process payments, billing and collection; and
 - 1.4. to process applications for employment.
2. As required by Hugh Cartwright & Amin to conduct our business and pursue our legitimate interests, in particular:
 - 2.1. to administer and manage our relationship with you, including accounting, auditing, and taking other steps linked to the performance of our business relationship including identifying persons authorised to represent our clients, suppliers or service providers;
 - 2.2. to carry out background checks, where permitted;
 - 2.3. to analyse and improve our services and communications and to monitor compliance with our policies and standards;

- 2.4. to manage access to our premises and for security purposes;
 - 2.5. to protect the security of our communications and other systems and to prevent and detect security threats, frauds or other criminal or malicious activities;
 - 2.6. for insurance purposes;
 - 2.7. to exercise or defend our legal rights or to comply with court orders;
 - 2.8. to provide legal advice and legal services to our clients;
 - 2.9. to collect information about your preferences to personalise and improve the quality of our communications with you.
3. For purposes required by law, including maintaining records, compliance checks or screening and recording (e.g. anti-money laundering, financial and credit checks, fraud and crime prevention and detection, trade sanctions and embargo laws). This can include automated checks of personal data you provide about your identity against relevant databases and contacting you to confirm your identity or making records of our communications with you for compliance purposes.

We will not use your personal data for taking any automated decisions affecting or creating profiles other than as described above.

Disclosure of your personal data

We share your personal data in the following circumstances:

1. With third parties including certain service providers we have retained in connection with the legal services we provide, such as barristers, consultants, mediators, or experts and other legal specialists such as law firms for obtaining specialist or foreign legal advice, translators, couriers, or other necessary entities;
2. If we have collected your personal data in the course of providing legal services to any of our clients, we may disclose it to that client, and where permitted by law to others for the purpose of providing those services;
3. On a confidential basis with third parties for the purposes of collecting your feedback on the firm's service provision, to help us measure our performance and to improve and promote our services;
4. With our professional advisors such as lawyers and accountants, bankers, business advisors and to our professional indemnity or other relevant insurers;
5. With companies providing services for money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared;
6. With law enforcement agencies if required by applicable law.

Information we transfer

If we transfer your information to other countries, we will use, share and safeguard that information as described in this Policy. To provide legal and other services, we may transfer the personal information we collect to countries outside of the EEA which do not provide the same level of data protection as the country in which you reside and are not recognised by the European Commission as providing an adequate level of data protection. We only transfer personal information to these countries when it is necessary for the services we provide you, or it is necessary for any legal claims or subject to safeguards that ensure the protection of your personal information, such as European Commission approved standard contractual clauses.

For further information, including obtaining a copy of the documents used to protect your information, please contact us on hca@hcasols.com.

Security of your personal data

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.

We have also 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.

Updating personal data about you

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to hca@hcasols.com. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Your Rights

You have various rights with respect to our use of your personal data that you can exercise free of charge:

1. **Access:** You have the right to request a copy of the personal data that we hold about you.
2. **Accuracy:** We aim to keep your personal data accurate, current, and complete. We encourage you to contact us to let us know if any of your personal data is not accurate or changes.
3. **Objecting:** In certain circumstances, you also have the right to object to processing of your personal data and to ask us to block, erase and restrict your personal data. If you would like us to stop using your personal data, please contact us by sending an email to hca@hcasols.com.
4. **Porting:** You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.

5. **Erasure:** You have the right to ask us to erase your personal data when the personal data is no longer necessary for the purposes for which it was collected, or when, among other things, your personal data have been unlawfully processed.
6. **Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority, or to seek a remedy through the courts.

You may, at any time, exercise any of the above rights, by contacting hca@hcasols.com with a proof of your identity, i.e. a copy of your passport, or any other valid identifying document.

Right to withdraw consent

If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there is another legal ground for the processing.

How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and, where required for Hugh Cartwright & Amin to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

If you want to learn more about our specific retention periods for your personal data established in our retention policy, you may contact us at hca@hcasols.com.

Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations.

Changes to our Privacy Policy

We reserve the right to update and change this Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Policy.

Contact Details

If you have any questions about this Privacy Policy, please contact us by sending an email to hca@hcasols.com or by writing to:

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London
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