



## Important information about your privacy

Any personal information we collect from you is processed in line with applicable data protection laws including EU General data Protection Regulation (GDPR) and this notice. When you use the website, our Privacy Policy located on our website applies.

Bower Cotton Hamilton (“we”, “us” and “our”) is the ‘data controller’ for the personal information you share with us.

If you have any specific concerns around the privacy of your personal information or require further information about how we manage your personal information, please get in touch with us directly.

By post: GDPR Office, 34 Ely Place, London EC1 6TD

By phone: 0207 353 1313

By email: [enquires@bowercotton.co.uk](mailto:enquires@bowercotton.co.uk)

### How we collect data

As a Bower Cotton Hamilton client, we collect personal information about you in connection with our legal products and services in the following ways.

- for your application for a Bower Cotton Hamilton product or service (either for yourself or for our client whom you represent)
- through analysis of your transactions and activities with us.
- publicly available sources, such as Companies House
- in the course or providing you with legal services.
- your personal interactions with us, such as face to face meetings, telephone calls, correspondence various forms of electronic communication and your use of our website.
- analysis of your dealings and transaction with us
- by consulting third parties such as credit references agencies, market research, surveys, social networking sites, fraud prevention agencies, government and law enforcement agencies
- reviewing information about you and third parties from sources which are publicly available such as Companies House

### Information we collect.

Personal information we collect may include:

- basic data such as your name, surname, title, date of birth and gender and your relationship to other persons
- contact data such as postal address, email address and telephone numbers.
- financial data such as your bank account details, and payments made to and received from you.
- new business intake data such as the numbers of your identity documents and other data provided by you or collected by us as part of our new business intake and client due diligence procedures.
- marketing and communications data such as your preferences in receiving marketing from us and our third parties and your communication preferences.
- matter related data such as Personal data provided to us by or on behalf of our clients or generated by us in the course or providing services to them, which may include special categories of data such as 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 and criminal convictions and offences.
- business administration and administrative purposes.

### When we use data

We are allowed to use personal information only if we have suitable legal basis to do so. We will only process your personal data on one of the following legal bases.

- to fulfil a contract, we have with you.
- when it is our legal duty
- when it is in our legitimate interest and is not overridden by your interests, rights and freedoms.
- when you consent to it

A legitimate interest is when we have a business or commercial reason to use your information including but not limited to internal administrative purposes, products development and enhancement, preventing fraud, ensuring network and information security.

However, this is only where our legitimate interests are not overridden by your interests, rights and freedoms.

### How we use your personal information

We may use your personal information for the following purposes:

- to create and administer your client account and administer your account to help tailor our services to you.
- communicate with you and provide information on specific products and/or services when you request it.
- to help to prevent, detect and investigate fraud and other financial crimes.
- in order to meet our legal obligations, such as conducting Anti-Money Laundering and Know Your Customer checks.
- to maintain the security of our services, as well as to detect and investigate activities that may be illegal or prohibited.
- to send your marketing information. You can unsubscribe from receiving these communications at any time by emailing [enquiries@bowercotton.co.uk](mailto:enquiries@bowercotton.co.uk)
- to profile you to enable us to personalise our services offerings and related communications.

### Sharing your personal information

We may share your personal information with:

- our service providers and third parties who provide services on our behalf.
- agents and administrator who we use to help run your accounts.
- credit referencing agencies
- fraud preventions and law enforcement agencies
- regulators, governments, courts, dispute resolution bodies, auditors

We will do this to:

- prevent fraud and other financial crimes.
- respond to enquiries and complaint.
- undertake transactional analysis.
- evaluate the effectiveness of marketing and for market research and training.
- support the provisions of service.
- comply with legal obligations, court orders, laws or regulations.

### Where your personal information will be sent

Your data may be transferred outside of the European Union from time to time to members or businesses within the Bower Cotton Hamilton group of companies or to trusted service providers and third parties.

In all cases, the transfer will be based on a European Commission adequacy decision, or we will implement adequate safeguards to protect your personal information, such as European Commission approved Standard Contractual Clauses or the EU-US Privacy Shield certification if your data is transferred to a Shield certified organisation in the USA. To obtain further information on the data transfer mechanisms on which we rely, please contact us as set out below.

In some countries the law may require us to share certain information, for example with tax authorities. In these cases, we will only share data with people who have the legal right to see it.

### Security

We take all reasonable precautions to keep your personal information secure, including safeguards against unauthorised access, use, or data loss. This includes ensuring our staff, partners and any third parties who perform work on our behalf comply with security standards as part of their contractual obligations.

### Returning your personal information

We will retain your personal information for as long as is necessary for the purposes described above, and in accordance with our data retention policy. Typically, we will retain your data to fulfil our business purposes, to comply with legal and regulatory requirements, or for any legal claims. We may keep your data for longer where this is necessary for statistical and historical research purposes. However, we will ensure all personally identifiable information is removed and at the appropriate time. Your

### What rights and obligations do you have

As well as our obligations, and commitment, to respect the privacy of your information, you also have certain rights relating to the personal information we hold about you which are outlined below. None of these are absolute and are subject to various exceptions and limitations. You can exercise these rights at any time by contacting us using the contact details below.

You may have some or all the following rights in respect of the information about you that we process.

- request us to give you access to it.
- request us to rectify and update.
- request us to restrict our using it, in certain circumstances.
- request us to erase it in certain circumstances.
- object to our using it, in certain circumstances.
- withdraw your consent to our using it.
- request us not to use for direct marketing.

### How we respond to your rights

You can exercise these rights at any time by contacting us using the contact details provided.

- We may need to validate your identity before we can respond to your request.
- If we are unable to confirm your identity or have strong reasons to believe that your request is unreasonably excessive or unfounded, we may deny it.
- Once we have validated your identity, we aim to respond to your requests within 30 days and no later than three months from receipt of complex requests. We will let you know if we need additional time to complete.
- We will always let you know whether we accept, or refuse, your request.

### Making a data protection complaint

If you have any concerns about the use of your personal data, or the way we handle your requests relating to your rights, you can raise a complaint directly with us using the contact details provided.

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with a relevant Supervisory Authority. The UK Information Commissioner's Office via the details available on their website: [www.ico.org.uk](http://www.ico.org.uk)

### Changes to the fair processing notice

We may update this notice (and any supplemental privacy notice) from time to time. We will notify you of the changes where required by law to do so. This notice was last modified on 24 July 2023.