

Adamson Rice

PRIVACY POLICY

Version 1

Document Control

REVISION NO	LAST AMENDED	AUTHOR	REASON FOR AMENDMENT	APPROVED BY
1	13/06/2024	Lenore Rice	Initial creation	Lenore Rice / Natasha Adamson

CONTENTS

1	Definitions & Introduction
2	Privacy policies
3	Client privacy notice
4	Employee privacy notice
5	Web privacy notice
Appendix 1	Client privacy notice
Appendix 2	Employee privacy notice
Appendix 3	Web privacy notice

1 DEFINITIONS & INTRODUCTION

- 1.1 The Firm: Adamson Rice law firm is a limited company registration number NI714555, whose registered office is situated at 29 High Street, Bangor, Co Down, Northern Ireland BT20 5BG which is regulated by the Law Society of Northern Ireland (www.lawsoc-ni.org).
- 1.2 The Partners: Natasha Adamson and Lenore Rice
- 1.3 DPO: Data Protection officer, Lenore Rice
Email: enquiries@adamsonrice.co.uk
- 1.4 GDPR: The Data Protection Act 2018 being the UK's implementation of the EU General Data Protection Regulations
- 1.5 ICO: The Information Commissioner's Office – Northern Ireland, 10th Floor Causeway Tower, 9 James Street South, Belfast, BT2 8DN Website: www.ico.org.uk

The Firm is committed to protecting the privacy of information; whether client, employee or users of firm resources such as websites. The purpose of maintained privacy notices is to inform people on how we use and protect different types of information, as well as giving information on how to raise a query or complaint in respect of the information we hold.

This document, and the privacy notices within it are subject to ongoing review as part of the annual review cycle. Reviews will be performed by the Partners with responsibility for data protection.

2 PRIVACY POLICIES

The firm maintain the following privacy notices:

- Client privacy notice
- Employee privacy notice
- Web privacy notice

The type of privacy notice will determine its content and distribution.

3 CLIENT PRIVACY NOTICE

The current client privacy notice is shown within Appendix 1. The client privacy notice must be communicated to all clients as part of the engagement process.

4 EMPLOYEE PRIVACY NOTICE

The current employee privacy notice is shown within Appendix 2. It must be communicated to all employees of the firm. As part of the induction process, employees must certify that they have read and understood the privacy notice. Any changes to the employee privacy notice must be recertified by each employee.

5 WEB PRIVACY NOTICE

The current web privacy notice is shown within Appendix 3. It is available on the firm's website(s) for any visitor to view.

APPENDIX 1: CLIENT PRIVACY NOTICE

Privacy Notice under the GDPR

We respect your trust in us to use, store and share your information. We try to keep our data protection information as simple as possible. Under GDPR we are a data controller of the personal data we hold and process. We share your information with colleagues in the Firm to help us provide our services, comply with regulatory and legal requirements and improve our service levels. Our Partners oversees how the Firm collects, uses, shares and protects your information to ensure your rights are fulfilled and you can contact the DPO for further information.

We collect personal information from you, for example, when you instruct us to provide a legal service. We also collect information through our website, apps, social media, discussion forums, market research and CCTV footage.

Our website uses 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit our website or apps. They help us make the site work better for you.

When you, or a partner, family member or colleague on your behalf, instruct us to provide a legal service, and during the time you avail of our services, we carry out information searches and verify your identity. We do this by sending and receiving information about you to and from third parties including reference and fraud prevention agencies. We and these agencies may keep records of our searches whether or not the legal service goes ahead.

We protect your information with security measures under the applicable laws and we meet UK standards. We keep our computers, files and buildings secure. When you contact us to ask for your information, we may ask you to identify yourself. This is to help protect your information. To meet our legal and regulatory obligations we hold your information while you are a client and for a period of time after that. We do not hold it for longer than necessary.

To use your information lawfully, we rely on one or more of the following legal bases: -

- performance of a contract;
- legal obligation;
- protecting the vital interests of you or others;
- public interest;
- our legitimate interests; and
- your consent.

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our legal services.

Sometimes we need your consent to use your personal information. We, for example, need your consent to make you aware of legal services which may be of interest to you. We may do this by our client care letters, terms of business, phone, post, email, text or through other digital media.

You can decide how much of this information about our other legal services you want to accept when you apply for new legal services. If we ever contact you to get your feedback on

ways to improve our legal services you have the choice to opt out. When we use sensitive personal information about you we ask for your consent. Before you give your consent, we tell you what information we collect and what we use it for. You can remove your consent at any time by contacting us.

We use information about you to: -

- provide relevant legal services;
- identify ways we can improve our legal services;
- maintain and monitor our legal services;
- protect both your & our interests & the interests of others;
- meet our legal and regulatory obligations; and
- decide and recommend how our legal services might be suitable for you.

To provide our legal services under the terms and conditions we agree between us we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our legal services. We analyse the information that we collect on you through your use of our legal services and on our social media, apps and websites.

This helps us understand how we interact with you and our position in the marketplace. Examples of how we use this information include helping protect you and others from financial crime, offering you legal services and personalising your experience. We may report trends we see to third parties. These trend reports may include information such as the efficiency & speed of our services and the average time taken for different types of legal matters. When we prepare these reports, we group clients' information and remove any names. We do not share information in these reports that can identify you as a client, such as your name, or other details.

Sometimes we share your information with third parties. For example, to:

- provide services and information;
- analyse information;
- research your experiences dealing with us;
- collect debts;
- sell whole or part of our business;
- prevent financial crime;
- trace information;
- protect both your & our interests;
- the general public if you contribute to a public forum;
- our business partners such as our IT providers, search agents, barristers, and experts advising on aspects of your case; and
- law enforcement officials, government authorities and other third parties to meet our legal obligations.

In order to process your instructions, we will supply your personal information to reference agencies, and they will verify & give us information about you. We do this to check your identity, prevent criminal activity and speed up the services we provide to you. Your data will also be linked to the data of your spouse, partner, any other persons or parties who jointly instruct us or relatives or friends who you, or they, have recommended our legal services and to your financial associates. The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services. Further details of these agencies and how they process your information can be found on our websites. We expect these third parties to have the same levels of information protection that we have. We also

have to share information with third parties to meet any applicable law, regulation or lawful request.

When we believe we have been given false or misleading information, or we suspect criminal activity, we must record this and tell law enforcement agencies, which may be either in or outside the UK.

We may transfer your personal information outside of the European Economic Area (EEA). If, for example, you are purchasing property from a USA company that is governed by USA or local stock exchange regulation we must pass information verifying your identity to the seller's solicitor who will pass it on to their USA client. We expect the same standard of data protection is applied outside the EEA to any such transfer and the use of the information to ensure your rights are protected.

You will find information about your rights, when they apply and our responsibility to you on the ICO website. You can exercise your rights by writing to the DPO. Please make your instructions clear when exercising your rights. We can help you with: -

- ➔ Accessing your personal information - you can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information.
- ➔ Updating and correcting your personal details removing consent - you can change your mind wherever you give us your consent.
- ➔ Restricting and objecting - you may have the right to restrict or object to us using your personal information.
- ➔ Deleting your information (your right to be forgotten) - you may ask us to delete your personal information.
- ➔ Moving your information (your right to Portability) - where possible we can share a digital copy of your information directly with you or another organisation.

When you contact us to ask about your information, we may ask you to identify yourself - this is to help protect your information. We generally do not charge you when you contact us to ask about your information. If however, requests are deemed excessive or manifestly unfounded we may charge a reasonable fee to cover the additional administrative costs or choose to refuse the request.

If you have a complaint about the use of your personal information, please let a member of staff in our office know, giving them the opportunity to put things right as quickly as possible. If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated. You can register a complaint on our website, by phone, by email or in person at our offices. We ask that you supply as much information as possible to help our staff resolve your complaint quickly. You can also contact the ICO.

We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and services. You can always find an up-to-date version of this notice on our website at www.adamsonrice.com.

Please note that we will NEVER email you our bank details due to the risk of criminals intercepting and changing legitimate bank details with the objective of stealing money. We cannot accept responsibility if you transfer money into an incorrect bank account – please be vigilant and never email your bank details or accept bank details by email!

Governing Law and Jurisdiction

This agreement and any dispute or claim arising out of or in connection with it or its subject matter shall be governed by and construed in accordance with the law of Northern Ireland. You and the Firm irrevocably agree that the courts of Northern Ireland shall have exclusive jurisdiction to settle any dispute or claim that arises out of or in connection with this agreement or its subject matter.

APPENDIX 2: EMPLOYEE PRIVACY NOTICE

PRIVACY NOTICE FOR EMPLOYEES

We have always appreciated your trust in us to use, store and share your information. In this notice, we explain how we collect personal information about you, how we use it and how you can interact with us about it. We try to keep this notice as simple as possible but if you are unfamiliar with our terms or want more detail on any of the information here, please speak to a Partner.

WHO WE ARE

In this notice, 'we', 'us' and 'our' refer to the Partners of the Firm. Under GDPR we are a data controller of the personal data we hold and process.

We share your information within the Firm to help us provide our services, comply with regulatory and legal requirements and improve our service levels.

Our Partners oversee how we collect, use, share and protect your information to ensure your rights are fulfilled. You can contact the Partners for clarification.

HOW WE COLLECT INFORMATION ABOUT YOU

We may have collected personal information from you completed on your application form, during your interview and induction process and ongoing employment with the Firm. We also collect information through our website, applications, social media, discussion forums, market research and CCTV footage.

Our website uses 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit our website or apps. They help us make the site work better for you.

During your recruitment process and during your employment we carry out information searches and verify your identity. We do this by sending and receiving information about you to and from third parties including reference and fraud prevention agencies. We and these agencies may keep records of our searches.

HOW WE KEEP YOUR INFORMATION SAFE

We protect your information with security measures under the laws that apply, and we meet UK standards. We keep our computers and all electronic devices, files and buildings secure. Our personnel information is held digitally and in locked cabinets with restricted access. Your interactions with the Partners and your line manager are confidential. If you have an issue with your line manager, you may request a meeting with a Partner.

HOW LONG WE KEEP YOUR INFORMATION

To meet our legal and regulatory obligations we hold your information while you are an employee and for a period of time after that. We do not hold it for longer than necessary.

MEETING OUR LEGAL AND REGULATORY OBLIGATIONS

To use your information lawfully, we rely on one or more of the following legal bases:

- performance of a contract;
- legal obligation;
- protecting the vital interests of you or others;
- public interest;
- our legitimate interests; and
- your consent.

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with employment.

CONSENT

When we use sensitive personal information about you we ask for your consent. Before you give your consent, we tell you what information we collect and what we use it for. You can remove your consent at any time by contacting us.

HOW WE USE YOUR INFORMATION

We use information about you to:

- analyse performance at work;
- identify ways to improve your performance;
- provide training;
- monitor compliance with your contract of employment;
- protect both your & our interests & the interests of others;
- interact with external professionals in monitoring your health;
- meet our legal and regulatory obligations; and
- market you and your expertise to our clients and prospective clients.

To provide our legal services to our clients we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with employment.

We analyse the information that we collect on you through your use of IT software and on our social media, applications and websites. Examples of how we use this information include helping protect you and others from financial crime.

We may report trends we see to third parties. These trend reports may include information such as the efficiency & speed of our services and the average time taken for different types of legal matters. When we prepare these reports, we group employees' information and remove any names. We do not share information in these reports that can identify you as an employee, such as your name, or other details.

Your information and third parties

Sometimes we share your information with third parties. For example, to:

- provide legal services and information;
- analyse information;
- research your experiences working with us;
- pay you and collect funds you owe us;
- sell whole or part of our business;
- prevent financial crime;
- trace information;
- protect both your & our interests;
- the general public if you contribute to a public forum;
- our business partners such as our IT providers, search agents, barristers, and experts assisting us on aspects of our clients cases; and
- law enforcement officials, government authorities and other third parties to meet our legal obligations.

In order to confirm your appointment and to meet the ongoing requirements of our business and that of our clients we will supply your personal information to reference agencies, and they will verify & give us information about you. We do this to check your identity, prevent criminal activity, comply with our service level obligations to clients and meet the obligations we have to our regulators.

Your data may also be linked to the data of your spouse, partner or any other relatives or persons or parties whose information you tender to us as part of the legal services or when you jointly instruct us or relatives or friends who you, or they, have recommended our legal services and to your financial associates.

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. Further details of these agencies and how they process your information can be found on the ICO website. We expect these third parties to have the same levels of information protection that we have.

We also have to share information with third parties to meet any applicable law, regulation or lawful request. When we believe we have been given false or misleading information, or we suspect criminal activity, we must record this and tell law enforcement agencies, which may be either in or outside the UK.

INTERNATIONAL TRANSFERS OF DATA

We may transfer your personal information outside of the European Economic Area (EEA). We expect the same standard of data protection is applied outside the EEA to any such transfer and the use of the information to ensure your rights are protected.

APPENDIX 3: WEB PRIVACY NOTICE

The Firm may ask you to provide certain information when you use this website. The Firm is committed to ensuring your privacy is protected. This policy sets out how the Firm uses and protects any personal information that you provide when you use this website. If you have any queries about this policy, please contact the Firm before providing your information. The Firm may change this policy from time to time by updating this page. You should check this page

from time to time to ensure that you are happy with any changes. The information collected may include:

- Name and job title
- Contact information including e-mail address
- Gender
- Occupation and company details
- Interests in order to provide you with details of the Firm's products and services
- Other information relevant to recruitment processes

The Firm may use this information for the following reasons:

- Internal record keeping
- To improve its products and services
- Provide information relating to you or others if you indicate that you want to receive marketing material or similar communications
- Provide aggregate information and statistics for the purposes of monitoring website usage in order to help the Firm develop its website and services (these statistics will not include information that can be used to identify any individuals)
- Recruitment and selection purposes
- To pass your details to accountants, consultants and other professionals, for the purpose of obtaining professional advice and complying with the Firm's contractual obligations

If you have supplied contact details, the Firm may contact you by e-mail, phone, fax or mail.

Online Enquiry Forms

The Firm uses a Clio application as its online confidential client Enquiry form portal, where we collect the below information:

- Name
- Email
- Phone Number
- Details of enquiry

The Firm reserves the right to monitor all enquiry forms subject to and in accordance with law. All online enquiries are the Firm's sole property and any records so kept shall be conclusive proof of instructions given or alleged to have been given in the event of a dispute.

Web Site Security

The internet is not a secure medium. The Firm is committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

The Firm may use cookies on certain areas of this website for security purposes. The Firm does not use cookies to collect information about you. You can choose to disable the cookies from your browser and delete all the cookies currently stored on your computer. On Microsoft Internet Explorer, this can be done by selecting "Tools/Internet Options" and reviewing your privacy settings or selecting "delete cookies". This may prevent you from taking full advantage of the website.

The website may contain links that make it easy for users to visit other websites. If the user uses the links to leave the website and visit a website operated by a third party, the Firm does

not have any control over that website. Accordingly, the Firm cannot be responsible for the protection and privacy of any information which users have provided while visiting such websites. Users should exercise caution and look at the privacy statement applicable to the website in question.