

## PRIVACY NOTICE FOR CLIENTS

Privacy Policy of Mulberry's Employment Law Solicitors ("Mulberry's")

### **Does Mulberry's hold personal data about me?**

Yes if you are any of the following:

- You have had dealings with Mulberry's or Mulberry's clients
- You have contacted Mulberry's for any reason
- Your personal data is in any document or correspondence sent to or obtained by Mulberry's
- You have visited Mulberry's website.

### **Why does Mulberry's obtain personal data about me?**

Mulberry's only seeks personal data about you where

1. you are a client of Mulberry's (or a client representative or a beneficial owner of a client). In these cases, Mulberry's may obtain personal data to establish your identity as part of its "Know Your Client" (KYC) obligations. The data might come from you, or from public sources and search companies. Mulberry's only uses this data for the prevention of money laundering and terrorist financing;
2. you deal with Mulberry's or Mulberry's clients. In these cases, Mulberry's may obtain data about you where the data is relevant to those dealings. This data might come from you, or from public sources and search companies.

Beyond this, Mulberry's obtains a variety of documents and correspondence in the ordinary course of its business. Personal data about you (particularly things like your name and contact details) might be included in these documents even though you have no direct dealings with Mulberry's or Mulberry's clients. This personal data is not used by Mulberry's other than as a consequence of making ordinary use of the underlying documents.

If you visit Mulberry's website then website analytics provide Mulberry's with your IP address and your type of device and browser, but not your name or physical address.

## **What does Mulberry's do with my personal data and what is the legal basis for this?**

Mulberry's uses the personal data as part of providing legal services, obtaining goods and services for its business and complying with UK law. The bases for this processing as 'legal compliance' in respect of KYC information and 'legitimate interests' in respect of other ordinary business activities of Mulberry's.

## **Does Mulberry's share my personal data with anyone else?**

Not for selling or to make it generally available. But I may share it in the following circumstances:

- Mulberry's deals with a variety of entities in providing its legal services. Personal data might be shared as a necessary part of this activity or where it cannot reasonably be avoided
- If you are a client (or a client representative or a beneficial owner of a client) then Mulberry's might share details of your name, address, date of birth, and ID documents with a search company in order to verify your identity
- Like any other business, Mulberry's depends on services from various external companies. Some of these services (such as email hosting and data backups) involve the supplier holding data which has been collected by Mulberry's
- If you do (or intend to do) something which risks injury or harm, then Mulberry's might provide personal data about you to the police or to the affected persons
- Mulberry's might be obliged to disclose personal data about you under a court order or a statutory obligation
- if Mulberry's is sold to a new owner, then all personal data will be transferred to the new owner to enable the continuation of the business.

## **Does Mulberry's transfer personal data about me outside Europe?**

Mulberry's's office and IT equipment is located in the UK. Storage is using Google for business cloud computing. These Cloud Storage solutions may be outside Europe but Google's data processing agreement is fully compliant

with all European data protection laws. It also has an up to date Data Privacy Shield certificate.

### **How long does Mulberry's retain my personal data?**

A file will normally be deleted after 6 years after its last activity unless there are reasons to extend that period.

### **What rights do I have in respect of personal data about me?**

More detailed information is available from the website of the Information Commissioner's Office but briefly summaries, your rights are:

- to be informed of the personal information which is held about you
- to stop personal information about you being used for marketing purposes
- to correct or remove inaccurate personal information about you
- to obtain compensation where you have suffered damage and distress.

### **What if I have a complaint?**

Contact me, Zoe Lagadec directly ([zoe@mulberryssolicitors.com](mailto:zoe@mulberryssolicitors.com)). If I cannot resolve your concern, then you can complain to the ICO's office ([www.ico.org.uk](http://www.ico.org.uk)).