

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

1. Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Rebian Solicitors of 11 Park Square East, Leeds, LS1 2NG, together our trading name 'VelocityHR'
Our data protection officer	Ian Townsend 11 Park Square East, Leeds, LS1 2NG Tel: 0113 203 1999 email: i.townsend@rebian.co.uk
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

2. Personal information we collect about you

As you are either (a) a current or past client of Rebian Solicitors, (b) on Rebian Solicitors marketing database, (c) a contact of Rebian Solicitors, or (d) a supplier of goods to Rebian Solicitors, we process your personal data. We may collect and use the following personal information about you:

- (a) Categories of personal data which may be processed about clients and contact of Rebian Solicitors:

Category of Data	Type of data included
Identity Data	First name, maiden name, last name, title, date of birth, passport details, drivers licence details, utility bill details, details from a death certificate, details contained in deeds of probate, details contained in a will, previous employment/work details, current employment details, other photographic identity documents required for anti-money laundering purposes
Contact Data	Billing address, postal address, email address and telephone numbers
Financial Data	Bank account details, payment card details, salary, employment benefits, details of insolvencies, bankruptcy details, details gained from searches in the Register of Inhibitions
Share Transfer Data	Names, address, bank account details, salary details, disclosure letter details, death certificates, deeds of probate, copy of wills share-holding details, share option details where applicable.
Disclosure Data	Employment history details, bankruptcy details, details of directorships and consultancy arrangements
Marketing & Communications Data	Name, company name, email address, preferences in relation to receiving marketing materials from us.

Special Categories of Personal Data	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.
Criminal Convictions & Offences	Details of past criminal convictions or offences

- (b) Categories of personal data which may be processed about contacts of Rebian Solicitors marketing database:

Category of Data	Type of Data included
Identity Data	First name, last name, title, company name, job position
Contact Data	Email address, marketing preferences

- (c) Categories of personal data which may be processed about third party suppliers

Category of Data	Type of Data included
Identity Data	First name, last name, title, company name, job position
Contact Data	Email address, marketing preferences

3. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). in this case, we mat have to cancel a product or services you have with us but we will notify you of this is the case at the time.

4. How your personal information is collected

We collect most of this personal information directly from you by the following means:-

- (a) **Direct Interactions:** in person, by telephone, text, email, our website or filing forms. This includes personal data you provide:-

Client and contact personal data	<ul style="list-style-type: none">• when you become one of our client's, as part of your file opening and relationship management procedures;• during the course of the work we undertake for you where personal data is processed in matters on which we are advising;• when requesting marketing communications to be sent to you.
Marketing database personal data	<ul style="list-style-type: none">• when you specifically request marketing to be sent to you in person, by phone, email, post or via our website;• when you give us your business card and/or contact details at an event including workshops, seminars, business development or networking events;• when we have provided legal services to you.
Supplier personal data	<ul style="list-style-type: none">• when you become a supplier of ours, as part of our relationship management procedures;• during the course of the work you undertake for us where personal data is processed as part of the goods or service you are providing.

- (b) Third parties or publicity available sources: we may receive personal data about you from various third parties and public sources as set out below:

Client and contact personal data	<ul style="list-style-type: none">• Publicly available sources such as Companies House• From another solicitors e.g. to gain copies of other documents.• from a third party with your consent e.g. Bank.• from Cookies on our website. For more information on our use of cookies, please see our cookie policy.
Supplier personal data	<ul style="list-style-type: none">• Publicly available sources such as the internet, when we are looking to source suppliers;• Third party recommendations

5. How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide enter into a contract with you and open a file for you to enable us to provide legal services and/or products to you, and all related administrative procedures.	<ul style="list-style-type: none"> • For the performance of our contract with you or to take steps at your request before entering into a contract. • To comply with our legal obligations.
To prevent and detect fraud against you or your organisation.	For our legitimate interests or those of a third party, ie to minimise fraud that could be damaging for us and for you
<p>Conducting checks to identify our customers and verify their identity, including without limitation anti-money laundering checks.</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulator</p>	<ul style="list-style-type: none"> • To comply with our legal and regulatory obligations. • Necessary in order to perform our contract with you.
<p>To provide day to day legal services which will include:-</p> <ul style="list-style-type: none"> • Corresponding with you • Providing legal advice • Corresponding with other solicitors • Processing payment as part of our work for you which may involve external third parties • strong personal data which will involved external third parties • Disclosure exercises • Litigation work 	<ul style="list-style-type: none"> • To comply with our legal and regulatory obligations. • Necessary in order to perform our contract with you.
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies, including without limitation your insurers.	Necessary in order to perform our contract with you.

What we use your personal information for	Our reasons
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Updating customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing orders and new products</p>
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> • existing and former customers; • third parties who have previously expressed an interest in our services; • third parties with whom we have had no previous dealings. 	For our legitimate interests or those of a third party, ie to promote our business to existing and former customers

What we use your personal information for	Our reasons
External audits and quality checks, eg for the Solicitors Regulation Authority and the audit of our accounts in accordance with the Solicitors Accounts rules.	To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

6. Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and/or services, including exclusive offers, promotions or new products and/or services.

We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at i.townsend@rebian.co.uk
- using the 'unsubscribe' link in emails or 'STOP' number in texts

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

7. Who we share your personal information with

We routinely share personal information with:

Who?	Details
Service Providers	Service providers acting as processors including those who provide IT and system administration services, file storage services, typing services, case management services and identity verification services.
Professional Advisors	Professional advisors acting as processors, controllers or joint controllers including lawyers, legal counsel, mediators, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
Authorities	Authorities such as HM Revenue & Customs, regulators and other authorities act as processors, controllers or joint controllers based in the UK who require reporting of processing activities in certain circumstances.
Other third parties	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, eg the Solicitors Regulation Authority and/or accountants appointed to conduct an audit of our client account in accordance with the Solicitors Accounts Rules.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

7. Where your personal information is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the UK and EEA'**.

8. How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary to (a) respond to any questions, complaints or claims made by you or on your behalf, (b) to show that we treated you fairly, and (c) to keep records required by law.

Below we have set out the key retention periods. For further details please contact our data protection officer.

Category of Data	How long will you keep my data?
Client Files	Client files will generally be kept for as long as you are a client of the firm and thereafter for 6 years.
Supplier Information	Supplier information will be kept for as long as we have an active contract or agreement in place with a supplier, plus 5 years.
Marketing database contract and personal data	<p>Personal data of individuals without out marketing database are usually obtained on the basis consent. There is no fixed time limit after which consent automatically expires and consent will remain valid for as long as we believe that it is a correct indication of the persons current wishes.</p> <p>if there is a significant change in circumstances, then we shall seek new consent.</p>

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

9. Transferring your personal information out of the UK and EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the UK and/or European Economic Area (EEA), eg:

- with your and our service providers located outside the UK/EEA;
- if you are based outside the UK/EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

If you would like further information please contact our Data Protection Officer (see 'How to contact us' below).

10. Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	<p>The right to object:</p> <ul style="list-style-type: none">• at any time to your personal information being processed for direct marketing (including profiling);• in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
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For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to our Data Protection Officer—see below: **'How to contact us'**; and
- let us have enough information to identify you (eg your full name, address and customer or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

11. Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

We operate a secure 'dropbox' which we may use for the secure transfer of data to you. Where we decide to use this dropbox system we will email you details of how to set up the necessary username and passwords.

12. How to complain

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

13. Changes to this privacy policy

This privacy notice was published on 10 May 2020.

We may change this privacy notice from time to time—when we do we will inform you via publication of the updated policy on our website.

14. How to contact us

Please contact us our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you. Our contact details are set out in the 'Key Terms' section above.