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Privacy Policy

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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 data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

This privacy policy does not apply to any third-party websites that may have links to our own website.

Clients of this firm should read this policy alongside our [terms of business](#), which provide further information on confidentiality. These will have been sent to you or can be found on our website [here](#).

Who are we and what do we do?

Blandy & Blandy LLP is a limited liability partnership, authorised and regulated by the Solicitors Regulation Authority under numbers 520336 (Reading main office), 620716 (Reading 33 Blagrove Street office), 659870 (Henley-on-Thames office) and 8006230 (Wokingham office).



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We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR) and we are responsible either as 'controller' or 'processor' of that personal data for the purposes of the UK GDPR. We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to services we provide to individuals in the European Economic Area (EEA).

Our services and website are not aimed specifically at children who are usually represented by their parents or guardians. If you are a child and you want further information about how we might use your data, please contact us (see '[How to contact us](#)' below).

Key terms

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

We, us, our	Blandy & Blandy LLP
Data Protection Officer	Nick Burrows Contact details: Nick.Burrows@Blandy.co.uk 0118 951 6851
Personal data	Any information relating to an identified or identifiable individual
Data subject	The individual who the personal data relates to
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation

Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of providing services to you. This may include special category personal data.

Personal data we will collect	Personal data and Special Category Data we may collect depending on why you have instructed us
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Your name, address and telephone number

Information to enable us to check and verify your identity, e.g. your date of birth or passport details

Electronic contact details, e.g. your email address and mobile phone number

Information relating to the matter in which you are seeking our advice or representation

Information to enable us to undertake a credit or other financial checks on you

Your financial details so far as relevant to your instructions, e.g. the source of your funds if you are instructing on a purchase transaction, or our regulatory obligations, e.g. source of wealth and funds for anti-money laundering purposes

Information about your use of our IT communication and other systems, and other monitoring information, e.g. if using our secure online portal

Your National Insurance and tax details

Your bank and/or building society details

Details of your professional online presence, e.g. LinkedIn profile

Details of your spouse/partner and dependants or other family members, e.g. if you instruct us on a family matter or a will

Your employment status and details including salary and benefits, e.g. if you instruct us on a matter related to your employment or in which your employment status or income is relevant, or in relation to our regulatory obligations, e.g. anti-money laundering purposes

Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information, e.g. if you instruct us on an immigration matter or in relation to our anti-money laundering obligations.

Details of your pension arrangements, e.g. if you instruct us on a pension matter or in relation to financial arrangements following breakdown of a relationship

Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), e.g. if you instruct us on matter related to your employment or in which your employment records are relevant

Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs, e.g. if you instruct us on a discrimination claim



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	<p>Your trade union membership, e.g. if you instruct us on discrimination claim or your matter is funded by a trade union</p> <p>Personal identifying information, such as your eye colour or your parents' names, e.g. if you instruct us to incorporate a company for you</p> <p>Your medical records or other health information, e.g. if we are acting for you in a matter where we require details connected with your health, including to keep staff, clients and third parties safe, e.g. in a pandemic situation or other health emergency</p>
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The above lists are not exhaustive. We collect and use this personal data to provide services to you. If you do not provide Personal Data or Special Category Data we ask for, it may delay or prevent us from providing those services to you.

How your personal data is collected

We collect most of this information from you direct, or via any secure online client portal. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
 - sanctions screening providers;
 - credit reference agencies;
 - client due diligence providers;
- from a third party with your consent, e.g.:
 - your bank or building society, another financial institution or advisor;
 - consultants and other professionals we may engage in relation to your matter;
 - your employer and/or trade union, professional body or pension administrators;
 - your doctors, medical and occupational health professionals;
- via our website—we use cookies on our website (for more information on cookies, please see our [cookie policy](#))



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- via our information technology (IT) systems, e.g.:
 - case management, document management and time recording systems;
 - reception logs;
 - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems communications systems, email and instant messaging systems.

How and why we use your personal data

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

- 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 – where we need your consent, we will ask for it separately from this privacy policy and you can withdraw consent at any time.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. You have the right to object to processing based on legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms or the processing is required to establish, exercise or defend legal claims.

Any personal data that we receive from you for the purposes of complying with our anti-money laundering obligations pursuant to the Money Laundering Regulations will be processed only for the purposes of preventing money laundering and terrorist financing or as otherwise permitted by law or with your consent.

The table below explains what we use (process) your personal data for and why:

What we use your personal data for	Our reasons
To provide services to you	To fulfil our contract with you or to take steps at your request before entering into a contract



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Preventing and detecting fraud against you or us	For our and/ or your legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our clients and verify their identity, including credit reference checks via external credit reference agencies Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory or other obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator or the government	Depending on the circumstances: <ul style="list-style-type: none">• to comply with our legal and regulatory obligations, e.g. our anti-money laundering and sanctions-screening obligations• for our legitimate interests
To enforce legal rights or defend or take legal proceedings	Depending on the circumstances: <ul style="list-style-type: none">• to comply with our legal and regulatory obligations;• for our legitimate interests, i.e. to protect our business, interests and rights
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	Depending on the circumstances: <ul style="list-style-type: none">• to comply with our legal and regulatory obligations• for our legitimate interests
Ensuring internal business policies are complied with, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. 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, i.e. to be as efficient as we can so we



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	can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: <ul style="list-style-type: none">• for our legitimate interests or those of a third party, i.e. to protect our intellectual property, trade secrets and other commercially valuable information;• to comply with our legal and regulatory obligations
Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, services range, work type or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and changes to our systems	Depending on the circumstances: <ul style="list-style-type: none">• for our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and/ or for you• to comply with our legal and regulatory obligations
Protecting the security of systems and data used to provide services	Depending on the circumstances: <ul style="list-style-type: none">• for our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and/ or for you• to comply with our legal and regulatory obligations <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and</p>



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	to prevent and detect criminal activity that could be damaging for you and/or us
Updating and enhancing client records	Depending on the circumstances: <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 and regulatory obligations• for our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services, or in relation to health and safety issues such as those which may arise in a pandemic or other health emergency
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, the safety of our staff, clients and third parties, staff administration and assessments	Depending on the circumstances: <ul style="list-style-type: none">• to comply with our legal, regulatory and other obligations• for our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you, and to keep our staff, clients and third parties safe, e.g. in a pandemic or other health emergency
Marketing our services to: —existing and former clients; —third parties who have previously expressed an interest in our services;	Depending on the circumstances: <ul style="list-style-type: none">• for our legitimate interests or those of a third party, i.e. to promote our business• consent



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—third parties with whom we have had no previous dealings.	
Credit reference checks via external credit reference agencies	For our legitimate interests, i.e. to ensure our clients are likely to be able to pay for our services and to provide verification evidence in relation to our anti-money laundering obligations
External audits and quality checks, e.g. for Lexcel, CQS, ISO or Investors in People accreditation and the audit of our accounts	Depending on the circumstances: <ul style="list-style-type: none">• for our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards;• to comply with our legal and regulatory obligations

How and why we use special category personal data

Where we process special category personal data (see above [‘Key terms’](#)), we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else’s) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims—this includes using special category personal data, where necessary, for:
 - actual or prospective court proceedings;
 - obtaining legal advice; or
 - establishing, exercising or defending legal rights in any other way.
- the processing is necessary for reasons of substantial public interest.



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Promotional communications/ Marketing

We may use your personal data to send you updates (by email, text message, telephone, post or social media channels) about legal developments that might be of interest to you and/or information about our services, including invitations to events, exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal data for promotional purposes/ marketing (see above '[How and why we use your personal data](#)'). This means we do not usually need your consent to send you promotional communications/ marketing information. Where this is not the case, we will always ask for your consent.

In all cases, you have the right to opt out of receiving promotional communications at any time by:

- contacting us (see [How to Contact Us](#) below)
- using the 'unsubscribe' link in emails or 'STOP' number in texts.

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

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

Who we share your personal data with

We routinely share personal data with:

- third party external advisors or experts engaged in the course of providing services to you, e.g. barristers, medical professionals, accountants, tax advisors or other experts;
- third parties we use to help deliver our services to you, e.g. providers of our case management and finance systems, IT service providers including cloud service providers such as data storage platforms, shared service centres and financial institutions in connection with invoicing and payments, delivery companies, your mortgage provider or HM Land Registry in the case of a property transaction, or Companies House;
- companies providing services for money laundering checks and other crime prevention purposes and companies providing similar services, including financial institutions and credit reference agencies;
- third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- other third parties we use to help promote our business, e.g. marketing agencies;
- our insurers and brokers;
- our bank;



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- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. typing services, marketing agencies, digital identification and verification services.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We ensure all outsourcing providers operate under service agreements that are consistent with our legal and professional obligations, including in relation to confidentiality.

We or third parties mentioned above occasionally also share personal data with:

- our and their external auditors, e.g. in relation to Lexcel or CQS accreditation and the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations.

If you would like more information about who we share our data with and why, please contact us ([‘How to contact us’](#) below)

Where your personal data is held

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see [‘Who we share your personal data with’](#)) and in our cloud storage facility.

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this occurs, see below: [‘Transferring your personal data abroad’](#).

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it was collected or as required by law.

As a general rule, we will keep your personal data for at least 7 years from the conclusion of your matter, in case you, or we, need to bring or defend any complaints or claims. However, different retention periods apply for different types of personal data and for different services as set out in our File Destruction Policy, further details of which are available on request.

We are legally obliged to retain any personal data that we receive from you for the purposes of complying with our anti-money laundering obligations pursuant to the Money Laundering Regulations for five years from the end of our business relationship with you. We will retain those data for longer than the five-year statutory period unless you instruct us otherwise.



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Following the end of the relevant retention period, we will delete or anonymise your personal data.

Transferring your personal data abroad

It is sometimes necessary for us to transfer your personal data to countries outside the UK but within the EEA. These countries are subject to the General Data Protection Regulation (GDPR) which provides effectively identical data protection as the UK GDPR and the UK government is therefore satisfied that such countries ensure an adequate level of protection of personal data.

It is sometimes necessary for us to transfer your personal data to countries outside the EEA. This may include countries which do not provide the same level of protection of personal data as the UK or EEA.

We will transfer your personal data outside the UK and EEA only where:

- the UK government or European Commission has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy regulation or adequacy decision) - A list of countries the UK currently has adequacy regulations in relation to is available on the ICO website [here](#) – see “[What countries or territories are covered by adequacy regulations?](#)” section. A list of counties the EU currently has adequacy decisions in relation to is available on the European Commission website [here](#); or
- there are appropriate safeguards in place (e.g. standard contractual data protection clauses published or approved by the relevant data protection regulator), together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under data protection law.

You can contact us (see ‘**How to contact us**’ below) if you would like a list of countries benefiting from a UK or European adequacy decision (or you can follow the link to the ICO or European Commission websites referred to above) or for any other information about protection of personal data when it is transferred abroad.

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 data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations



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Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data 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	The right to object: <ul style="list-style-type: none">• at any time to your personal data being processed for direct marketing (including profiling);• in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims.
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
The right to withdraw consent	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time You may withdraw consent by contacting our Data Protection Officer Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For further information on each of those rights, including the circumstances in which they apply, please contact us (see [‘How to contact us’](#) below) 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 us, see below: [‘How to contact us’](#); and



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- provide enough information to identify you (e.g. your full name, address and client or matter reference number) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have implemented appropriate technical and organisational measures to keep your personal data confidential and secure from unauthorised access, use and disclosure. Within our firm, those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We require our business partners, suppliers and other third parties to implement appropriate security measures to protect personal data from unauthorised access, use and disclosure.

We also have procedures 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 required to do so.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <https://www.getsafeonline.org/>. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '[How to contact us](#)'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator) and/ or the relevant supervisory authority in your jurisdiction. The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint/> or by telephone: 0303 123 1113. For a list of EEA data protection supervisory authorities and their contact details see [here](#).

Changes to this privacy policy

This privacy policy was first published on 3 September 2018 and last updated on 4 September 2023.

We may change this privacy policy from time to time. When we do we will update our website accordingly.

Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, e.g. your surname or address (see below '[How to contact us](#)').



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How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, or to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Blandy & Blandy LLP

One Friar Street, Reading, RG1 1DA

Tel: 0118 951 6800

Email: privacy@blandy.co.uk

Our Data Protection Officer's contact details are as set out in the **Key Terms** section at the start of this policy.

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us (see '[How to contact us](#)' above).