PRIVACY NOTICE

BACKGROUND:

Family Law Consultancy understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and staff and will only use personal data in ways that are described here and in a way that is consistent with our obligations and your rights under the law, in particular, the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Information About Us

Family Law Consultancy, a limited company registered in England under company number 07170779.

Registered address: 15 Charing Cross, Norwich, Norfolk, NR2 4AX

SRA Number: 5335221

VAT number: 866 44 12 09

Data protection enquiries to: Stephanie Walmsley

Email address: swalmsley@flc.uk.com / enquiries@flc.uk.com

Telephone number: 01603 664 000.

Postal Address: 15 Charing Cross, Norwich, Norfolk, NR2 4AX

We are regulated by the Solicitors' Regulation Authority (SRA).

We are members of The Law Society.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined in the UK General Data Protection Regulation (UK GDPR) as: "'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Personal data is, in simpler terms, any information about you that enables you to be identified.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the UK GDPR, you have the following rights, which we will always work to uphold:

a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know but you can always contact us to find out more or to ask any questions using the details in Part 11.

b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.

d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.

e) The right to restrict (i.e. prevent) the processing of your personal data.

f) The right to object to us using your personal data for a particular purpose or purposes.

g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Personal details including; name, date of birth, gender, national insurance number, nationality, marital status, religion, ethnicity, sexual orientation
- Personal contact details including; address/es; email address; telephone numbers;
- Identification information; passport and/or driving licence details
- Family background and history; relationship details, details of any children and other dependents;
- Financial information, including job title, income details, business interests, property ownership, savings, assets and investments, details of bank accounts, pensions and liabilities, employment prospects, mortgage raising capacity
- Payment information;

- How you heard of us;
- Details of the state of your health and that of your family members
- Details of any criminal convictions or involvement with the police
- Details of any involvement with social services

This data may be obtained through discussions with you or from the completion / provision of documents by you. Your personal data may also be received from the following third parties with whom we may interact on your behalf:

- Courts
- Social Services
- Police
- Your accountants
- Your GP
- Other solicitors
- Financial Advisors
- Estate agents
- Mortgage Advisors
- Medical experts and other professionals
- Cafcass (Children and Family Court Advisory and Support Service)
- Any other third party with whom you instruct us to liaise on your behalf

6. How Do You Use My Personal Data?

Under the UK GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

- Complying with legal requirements to verify your identity
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services, advising and representing you.
- Communicating with you or others on your behalf. This may include responding to emails or calls from you and corresponding with you and others on your behalf.
- Recording how you heard of us so that we can monitor and assess our sources of work and the effectiveness of our marketing strategies.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam.

We will always work to fully protect your rights and comply with our obligations under the UK GDPR, the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. We will determine the length of time for which your data will be kept at the point that your case is concluded / when you cease your instructions to us. You will be notified of the length of time for which your data will be stored and the following case type factors will be used to determine how long it is kept:

Initial Enquiries	6 years
Initial Consultations	7 years
Conveyancing, including: - acting for Purchaser - acting for Vendor on sale of whole title - acting for Vendor who retains part of title	12 Years
Common Law	6 Years
Probate and Administration where whole estate is wound up and distributed	6 Years
Wills Instruction Files (Wills themselves never destroyed)	50 Years
Family matters where no continuing obligation exists or from termination of such obligation	6 Years
Where matrimonial transfers are involved in family cases	12 Years
Family files where there are Orders in relation to children	Youngest Child's 18th birthday
Company formation (or similar)	12 Years
Other matters (at discretion)	6 Years
Financial Services Act Records	6 Years subject to the provisions of Financial Services Act 1986

8. How and Where Do You Store or Transfer My Personal Data?

We will normally only store or transfer your personal data in the UK. This means that it will be fully protected under the UK GDPR.

In exceptional circumstances, and only if you instruct us to do so, for example where your case has international aspects, we may transfer some or all of your personal data to countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA.

In these circumstances, we will take any possible additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK/EU and under the GDPR or UK GDPR, for example, and where possible, by seeking the agreement of those receiving the data that they will ensure the same levels of personal data protection that would apply under the UK GDPR.

9. Do You Share My Personal Data?

Limited contact information (i.e. name and email address) may be shared with third parties acting on our behalf in respect of feedback collection. However, this data will be encrypted and not viewable by third party providers unless and until you respond to the request. If you would like to opt out of this, please contact us using the details set out below at Part 11.

We will not share any of your other personal data with any third parties for any purposes unless you have specifically consented to us doing so in the interests of dealing with your case. This is subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract and/or engage with the following third parties in the supply of services to you to assist us in dealing with your case or for storing your data. In some cases, these third parties may require access to some or all of your personal data that we hold:

- Courts
- Barristers
- Other solicitors
- Accountants
- Financial Advisors
- Estate Agents
- Mortgage Advisors
- Medical experts and other professionals
- Social Services
- Cafcass (Children and Family Court Advisory and Support Service)
- Police
- IT support services
- Process Servers
- Mediators
- Secure storage facilities
- Litigation loan providers

This is not an exhaustive list as there may be occasions when we are required to engage on your behalf with other third parties. However, you would be notified in advance of any such other third parties to whom we might need to communicate your data. If any of your personal data is required by a third party, as described above, we will take suitable steps to ensure that your personal data is handled safely, securely, and in accordance

with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Where you instruct us to apply for a litigation loan (e.g., with Lime Capital Finance Limited or such other litigation loan provider as may be agreed), we will transfer client data to that litigation loan provider for the purpose of applying for a litigation loan. The litigation loan provider will then undertake a credit search using your data transferred from this firm. (This search will not leave a so called "hard footprint" on your credit file).

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required, up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: swalmsley@flc.uk.com / enquires@flc.uk.com

Telephone number: 01603 664 000

Postal Address: Family Law Consultancy, 15 Charing Cross, Norwich, Norfolk.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via an updated Privacy Notice being posted on our website at www.flc.uk.com.