

Introduction to our Privacy Policy

Sage Solicitors is dedicated to protecting the privacy of our clients, both as individuals and as businesses, which we take extremely seriously. This document sets out our Privacy Policy as a data processor of personal records in accordance with General Data Protection Regulations (GDPR).

This policy contains important information about how we collect your personal data, how we store it and how it is stored. We advise that you read this document carefully as it also contains information about your rights and how to contact us.

Contact us

You can reach us by telephone, email or by post, should you have any queries about the information we hold about you or the information contained in this policy. Our contact details are:-

A - Sage Solicitors, Edward Pavilion, Albert Dock, Liverpool, L3 4AF

E - info@sagesolicitors.co.uk

T - 0151 318 1599

Complaints

We expect that we will be able to answer any questions or concerns that you may have, however if you are not satisfied you have the right to raise a complaint with the Information Commissioner who can be contacted at <https://ico.org.uk/concerns>.

Collecting personal information

We ask you for personal data only when it is needed to provide services you have enquired about or asked us to provide, to respond to your requests for information or to enable us to carry out our legal obligations in connection with instructions you may have given us.

We may collect, store and use the following kinds of personal information:

- (a) information that you provide to allow the processing of your instructions including (but not limited to) your name, address, gender, date of birth, relationship status, health records, employment records and payment details, financial information, property information.
- (b) information about your computer and about your visits to and use of our website including your IP address, search terms, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths;
- (c) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters;
- (d) information that is generated in the course of the progression of your matter or services we provide;
- (e) information that you provide to us when using the services on our website.
- (f) information relating to any purchases of services or any other transactions that you enter into through our website, online chat or directly through our contact centre including your name, address, telephone number, email address;
- (g) information that you provide when responding to customer service feedback or complaints;
- (h) information contained in or relating to any communication that you send to us or send through our website, email or telephone calls (call recording) including the communication content and metadata associated with the communication; and
- (i) Information we receive from other sources.

- (j) payment data when purchasing services.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

We may also record phone calls for the purposes of staff training, mitigation of disputes and the collection of consent from data subjects.

Using personal information

Personal information submitted to us through our website, phone calls, emails or in person will be used for the purposes specified in this policy.

We may use your personal information to:

- (a) act upon, process and progress instructions given by you to us;
- (b) allow us to comply with our legal obligations in acting upon your instructions;
- (c) enable your use of our services;
- (d) send you information;
- (e) process payments;
- (f) send statements, invoices and payment reminders to you, and collect payments from you;
- (g) send you non-marketing commercial communications;
- (h) send you email notifications that you have specifically requested that form part of the service;
- (i) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- (j) deal with enquiries and complaints;
- (k) keep our website secure and prevent fraud;
- (l) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).
- (m) We will not supply your personal information to any third party for the purpose of their or any other third party's direct marketing without your express consent.
- (n) All our website and financial transactions are handled through our payment services provider, Worldpay. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, directly, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- (o) Data supplied by you for the purposes of our services is stored in our onsite facilities. We currently do not utilise cloud or data centre storage.
- (p) We do not use any automated decision-making processes or profile of you based on the data you provide.
- (q) Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending upon the types of information we receive).

Disclosing personal information

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, consultants, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy and in the delivery of our services.

We may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights including providing information to others for the purposes of fraud prevention and reducing credit risk;
- (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- (f) except as provided in this policy, we will not provide your personal information to third parties.

International data transfers

We do not transfer any personal data outside of the EEA, should this requirement change then we will contact you again to obtain your explicit consent to the transfers.

Retaining personal information

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to other obligations set out in this policy or legal obligations, we will usually delete personal data falling within the categories set out below at the date/time set out below:

- (a) personal and sensitive data including marital status, religion, race, gender, sexual orientation, dependants, dependants' names, medical history, criminal history, financial status, bank details – debt, CCJ, nationality, employment status, employer details where relevant – upon the completion of your matter;
- (b) when you ask us to erase your data compliant with GDPR Article 17-within the timeframes prescribed in GDPR.

Notwithstanding the other provisions of this policy, we will retain documents and records containing personal data:

- (i) to the extent that we are required to do so by law;
- (ii) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- (iii) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

There is no statutory period defined in legislation, so our retention period is based on 6 years retention unless there is a legal or business requirement to retain the data in excess of 6 years. Full details of our file storage /destruction policy are available on request.

Security of personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure password and firewall protected servers. All communications via our website, payment transactions, electronic documents and database records will be protected by encryption technology.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except during authenticating access to electronic systems).

Your rights

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) there is no payment required; and
- (b) the supply of appropriate evidence of your identity for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank, plus an original copy of a utility bill showing your current address.
- (c) We may withhold personal information that you request to the extent permitted by law.
- (d) You may instruct us at any time not to process your personal information as permitted by law.
- (e) You can instruct us to erase your data, compliant to GDPR Article 17.
- (f) You have the right to lodge a complaint with the Data Protection Authority, if you consider your rights have been breached in anyway.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.

Third party websites

Our website includes hyperlinks to, and details of, third party websites.

We have no control over, and are not responsible for, the privacy policies and practices of third parties if you register with them independently. If you follow any link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

Sage Solicitors employs third party suppliers to provide services including utilising the services of a credit reference agency (<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>).

Sage Solicitors employs third party suppliers to provide services including Case Management Software (Clio - <https://www.clio.com/uk/privacy/>) and Cloud Storage (Google Drive - <https://policies.google.com/privacy>).

Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy. We may notify you of any changes to this policy by email.

Please let us know if the personal information that we hold about you needs to be corrected or updated.