

PHH Solicitors Data Privacy Policy/Notice

We take your privacy very seriously. Please read this Privacy Policy/Notice 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 if 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 general Terms of Business, which provide further information on confidentiality.

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Do you need extra help?

If you would like this policy in another format (for example audio or large print) please [contact us](#).

Who are we and what do we do?

Palmer Hodgson & Heyes Limited, trading as PHH Solicitors, is a limited company, authorised and regulated by the Solicitors Regulation Authority under number 592353.

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).

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.

Key terms

Some key terms used in this policy/notice:

We, us, our: Palmer Hodgson & Heyes Limited, trading as PHH Solicitors

Personal data: Any information relating to an identified or identifiable individual.

Special categories of personal data: Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership. Genetic data; and biometric data (where used for identification purposes). Data concerning health, sex life, or sexual orientation.

Personal data we will collect about you

- Name, address, and telephone number
- Identity verification details (e.g., date of birth, passport details)
- Electronic contact details (e.g., email address, mobile phone number)
- Information related to your case or representation needs
- Data for credit or financial checks
- Relevant financial details (e.g., source of funds for transactions)
- Information on your use of our IT and communication systems and other monitoring data

Personal data we may collect, depending on why you have instructed us

- National Insurance and tax details.
- Bank and building society details.
- Professional online presence.
- Spouse/partner and dependents' details.
- Nationality, immigration status, and related documents.
- Pension arrangements.
- Employment status, salary, and benefits and/or employment records.
- Racial/ethnic origin, gender, sexual orientation, religious beliefs.
- Trade union membership.
- Medical records.

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We collect and use this personal data to provide services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing those services.

How your personal data is collected

We collect most of this information from you or your representative(s). However, we may also collect information:

- from publicly accessible records
- directly from a third party, eg:
 - sanctions and anti-money laundering screening providers;
 - credit reference agencies;
 - client due diligence providers;
- from a third party with your consent, eg:
 - 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
- via our information technology (IT) systems, eg:
 - via case management, document management and time recording systems;
 - reception logs;
 - through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV, communications systems, email and instant messaging systems.

Why we use your personal information

To fulfil our contract with you or to take steps at your request before entering a contract:

- Providing services to you.
- Updating and enhancing client records.

To comply with our legal and regulatory obligations:

- Statutory returns.

Depending on the circumstances, to comply with our legal and regulatory obligations and/or for our legitimate interests:

- Conducting identity checks for our clients.
- Screening for financial sanctions and embargoes.
- Complying with professional, legal, and regulatory obligations.
- To enforce legal rights or defend or take legal proceedings.
- Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.
- Ensuring the confidentiality of commercially sensitive information
- Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems.
- Ensuring safe working practices, staff administration and assessments.
- External audits and quality checks, eg Lexcel, Legal Aid Agency, ISO or Investors in People and the audit of our accounts to the extent not covered by 'activities necessary to comply with legal and regulatory obligations'.
- Updating and enhancing client records.
- To share your personal data with third parties that will or may take control or ownership of some or all our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary.

For our legitimate interests

- Preventing and detecting fraud against you or us.
- Ensuring internal business policies are complied with so we can deliver the best service to you.
- Operational reasons, such as improving efficiency, training and quality control to be as efficient as we can so we can deliver the best service to you at the best price.
- Statistical analysis to help us manage our business, eg in relation to our financial performance, client base, services range or

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other efficiency measures to be as efficient as we can so we can deliver the best service to you at the best price.

- Credit reference checks via external credit reference agencies to ensure our clients are likely to be able to pay for our services.

Depending on the circumstances, for our legitimate interests and/or with consent: Marketing our services to existing and former clients and third parties.

Where we process special category personal data (see above 'Key terms' above), we will also ensure we are permitted to do so under data protection laws, eg: 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; the processing is necessary to establish, exercise or defend legal claims; or the processing is necessary for reasons of substantial public interest.

Marketing

We may use your personal data to send you updates (eg by email, text message, telephone, post or social media channels) about our services, including exclusive offers, promotions or new services. We have a legitimate interest in using your personal data for marketing purposes (see above). This means we do not usually need your consent to send you 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 marketing communications at any time by contacting us.

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.

Where the Privacy and Electronic Communications Regulations (PECR) require us to obtain consent for electronic marketing (for example, email marketing to new clients or individuals who have not

previously engaged with us), we will obtain consent before sending such communications.

Who we share your personal data with

We routinely share personal data with:

- courts, tribunals and other parties as applicable to your matter, but as required to represent you;
- those we use to help deliver our services to you, eg providers of our case management and finance system, IT service providers including cloud service providers such as data storage platforms, shared service centres and financial institutions in connection with invoicing and payments;
- third party external advisors or experts engaged while providing services to you, eg barristers, tax advisors, and technology service providers
- companies providing services for money laundering checks and other crime prevention purposes and companies providing similar services, including financial institutions and credit reference agencies;
- other third parties we use to help promote our business, eg marketing agencies;
- third parties approved by you, eg social media sites you choose to link your account to or third-party payment providers;
- our insurers and brokers;
- our bank(s);
- our accountants;
- external auditors/assessors;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations.

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 the third parties mentioned above may occasionally also share personal data with:

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- our and their external auditors, eg in relation to the audit of our or their 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
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised, but this may not always be possible and the recipient of any of your personal data will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us.

Where your personal data is held

Personal data may be held at our offices, third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with' above).

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 'Transferring your personal data abroad' below.

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.

Generally, we will keep your personal data for at least seven 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. Please contact us if you require the retention period for your personal data.

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. This may include countries which do not provide the same level of protection of personal data as the UK.

We will do so only where the UK government has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy decision); or there are appropriate safeguards in place (eg 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 if you would like a list of countries benefiting from a UK adequacy decision 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.

Restriction of processing: The right to require us to restrict processing of your personal data—in certain situations, eg 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 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, eg processing carried out for our legitimate interests unless we demonstrate compelling legitimate

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grounds for the processing which override your interests or for establishing, exercising or defending 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. We do not use automated decision-making that produces legal or significant effects.

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 at any time. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

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

- email, call or write to us; and
- provide enough information to identify yourself eg 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. We limit access to your personal data to those who have a genuine business need to access it. 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.

How to complain

Please **contact us** if you have any queries or concerns about our use of your personal data. We hope we will be able to resolve any issues you may have. You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator) <https://ico.org.uk>

Changes to this privacy policy/notice

This privacy policy/notice was published on 8th May 2025 and it replaced earlier versions.

We may change our privacy policy/notice from time to time. When we do, we will publish the updated version on our website and ask for your consent to the changes if legally required.

Judith Abram is responsible for this policy.

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.

How to contact us

You can contact us and/or our Data Privacy Manager, by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Data Privacy Manager: Helen Hackett

Address: PHH Solicitors of York House, 1 York Ave, Thornton-Cleveleys FY5 2UQ

Email address: info@phhsolicitors.co.uk

Telephone number: 01253 824216