



PRIVACY NOTICE

This privacy notice describes how FRAZER COOGANS SOLICITORS (“the Firm”) collect and use personal information about you while we provide services to you and afterwards, in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are legally required to notify you of the information contained in this privacy notice. This notice does not form part of our letter of engagement to provide our services. We may update this notice at any time.

DATA PROTECTION PRINCIPLES

To comply with data protection law, the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about you from which you can be identified. There are also “special categories” of more sensitive personal data, which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, address, telephone numbers, and personal email addresses
- Information to enable us to verify your identity, including photographic identification and your date of birth
- Marital Status and dependants
- Where necessary, details about your personal finances including your bank account details

HOW WE WILL USE THE INFORMATION ABOUT YOU

We will use your personal information in the following circumstances:

1. Where we need to perform the contract entered into with you.
2. Where we need to comply with legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. In relation to “special categories” of particularly sensitive information, for example about your health or criminal convictions, with your consent, or, where you are not capable of giving your consent but it is necessary for us to use the information to protect your interests.
5. Where we need to protect your interests (or someone else’s interests).
6. Where it is needed in the public interest or for official purposes.

We will only use your personal information for the purposes for which we collected it and reasons that are compatible with that purpose.

DATA SHARING, DATA SECURITY AND DATA RETENTION

We may have to share your data with third parties, including other professionals involved in our work for you, our regulators where necessary and IT service providers. We do not allow our third party service providers to use your personal data for their own purposes. We require third parties to respect the security of your data and to treat it in accordance with the law.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures are available on request. We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of this where we are legally required to do so.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes, including for the purpose we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Details are available on request.

RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information and to receive a copy of it
- **Request correction** of your personal information that we hold about you
- **Request erasure** of your personal information where there is no good reason for us continuing to process it
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

To assert any of these rights please contact us in writing. You will not have to pay a fee to exercise your rights. However, we may charge a reasonable fee or refuse to comply with your request if your request for access is clearly unfounded or excessive.

RIGHT TO WITHDRAW CONSENT

In limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.