



Client Data & Privacy Policy

We take our clients’ privacy very seriously. Please read this Data & 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 regulatory body in the event you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (“GDPR”) which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Key terms

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

We, us, our	OCG Legal Ltd
Our data protection officer	Vajahat Sharif e-mail: Vajahat.sharif@ocglegal.co.uk t: 0044 (0) 1724 840400
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data 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 acting for you:

Personal data we will collect:	Personal data we may collect depending on why you have instructed us:
Your name, address and telephone number	Your National Insurance and tax details
Information to enable us to check and verify your identity	Your bank and/or building society details
Electronic contact details	Details of your spouse/partner and dependents or other family members,
Information relating to the matter in which you are seeking our assistance, advice or representation	Your employment status and details including salary and benefits
Information to enable us to undertake a credit or other financial checks on you	Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information
Your financial details so far as relevant to your instructions	Details of your pension arrangements
Information about your use of our IT, communication and other monitoring information	Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data)
	Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs
	Personal identifying information, such as your hair or eye colour or your parents’ names
	Your medical records

This personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

How your personal data is collected

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

- from publicly accessible sources;
- directly from a third party such as:
 - sanctions screening providers;
 - credit reference agencies;
 - client due diligence providers;

- from a third party with your consent such as:
 - your bank, building society, 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 may use ‘cookies’ on our website
- via our information technology (IT) systems such as:
 - 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, such as:

- 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.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (‘process’) your personal data for and our reasons for doing so:

What we use your personal data for:	Our reasons:
To provide legal services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify you and verify your identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory and professional bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to	For our legitimate interests or those of a third party say 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, for example, to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party to protect our intellectual property and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our practice	For our legitimate interests or those of a third party

What we use your personal data for:	Our reasons:
Preventing unauthorised access and modifications to our systems	For our legitimate interests or those of a third party; to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing client records	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 to make sure that we can keep in touch with you about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party; to make sure we are following our own internal procedures so we can deliver the best service to you
Marketing our services to: —existing and former clients; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party; to promote our business to existing and former clients
Credit reference checks via external credit reference agencies	For our legitimate interests to ensure you are likely to be able to pay for our services
External audits and quality checks	For our legitimate interests to maintain our professional accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

The above table does not apply to special category personal data, which we will only process with your explicit consent.

Promotional communications

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

We have a legitimate interest in processing your personal data for promotional purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

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

You have the right to opt out of receiving promotional communications at any time by contacting us.

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

Who we share your personal data with

We routinely share your personal data with:

- professional advisers who we instruct on your behalf or refer you to, for example, barristers, medical professionals, tax specialists or other experts;
- other third parties where necessary to carry out your instructions such as your mortgage provider, HM Land Registry, HM Revenue & Customs and Companies House;
- our insurers and brokers;
- external auditors;
- our banks;

- external service suppliers, representatives and agents that we use to make our business more efficient

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during internal re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

Where your personal data is held

Information 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').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: 'Transferring your personal data out of the EEA'.

How long your personal data will be kept

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.

When it is no longer necessary to retain your personal data, we will delete it.

Transferring your personal data out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA):

- with you and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the matter in which we are advising you.

These transfers are subject to special rules under European and UK data protection law.

We will ensure any transfer complies with data protection law and all personal data will be secure. Our standard practice is to use standard data protection contract clauses which have been approved by the European Commission.

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
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 some circumstances
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; —in certain other situations to our continued processing of your personal data

If you would like to exercise any of those rights, please email, call or write to our Data Protection Officer; and

- let us have enough information to identify you;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place 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 legally required to do so.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your information. The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy policy was published on 22nd April 2018.

How to contact us

Please contact our Data Protection Officer by post, email or telephone if you have any questions about this Data and Privacy Policy or the information, we hold about you.

Our contact details are shown below:

Our contact details	Our Data Protection Officer's contact details
Suite 9 Normanby Gateway Lysaghts Way Scunthorpe North Lincolnshire DN15 9YG	Vajahat Sharif e-mail: Vajahat.sharif@ocglegal.co.uk t: 0044 (0) 1724 840400

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).