

LAY CLIENT FAIR PROCESSING NOTICE (PRIVACY POLICY)

Atlantic Chambers (Chambers) is committed to maintaining the accuracy, confidentiality and security of your personal information. This Client Data Fair Processing Notice describes the personal information that Chambers collects from or about you, and how we use and to whom we disclose that information.

What Personal Information Do We Collect?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual. Personal information does not include anonymous or non-personal information.

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were clients of Chambers, including the personal information contained in:

- documents you provide to us;
- your initial enquiry;
- official ID documents such as a passport, driving licence and utility bill;
- notes taken by Council at conferences and in the preparation of papers;

In addition to the examples listed above, personal information also includes information such as name, home address, telephone, email address, date of birth and any other information necessary to permit Chambers and the Barrister to manage your case.

As a general rule, Chambers collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

Why Do We Collect Personal Information?

The personal information collected is used and disclosed for our business purposes, including establishing and managing your relationship with Chambers. Such uses include:

- determining if Counsel are able to assist you;
- ID checks;
- undertaking anti money laundering checks;
- case management;
- such other purposes as are reasonably required by Chambers.

Monitoring

Some areas of our premises are equipped with CCTV. Where in use, CCTV cameras are there for the protection of our clients and employees, and to protect against theft, vandalism and damage to Chambers goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.

This section is not meant to suggest that clients will in fact be monitored or their actions subject to constant surveillance. It is meant to bring to your attention the fact that such monitoring may occur.

How Do We Use Your Personal Information?

We may use your personal information for the purposes described in this Policy, or for any additional purposes that we advise you of and where your consent is required by law we have obtained your consent in respect of the use or disclosure of your personal information.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When Do We Disclose Your Personal Information?

We may share your personal information with our employees and members and other parties (for example expert witness) who require such information to assist us with managing the service we provide to you. Some of our systems where we may hold your data are provided and supported by Advanced Computer Software Group Limited.

Also, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements. In such a case, we will not disclose more personal information than is required under the circumstances;
- to comply with valid legal processes such as search warrants, subpoenas or Court orders;
- as part of Chambers regular reporting activities;
- to protect the rights and property of Chambers;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent where such consent is required by law.

Notification and Consent

Privacy laws do not generally require Chambers to obtain your consent for the collection, use or disclosure of personal information for the purpose of establishing, managing our relationship with you. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to your Barrister.

How is Your Personal Information Protected?

Chambers endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification or disclosure.

How Long is Your Personal Information Retained?

Except as otherwise permitted or required by applicable law or regulatory requirements, Chambers will retain your personal information only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). In most cases your data will be deleted 7 years after your case has settled.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your relationship with Chambers, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact the Head of Chambers. Please note that any such communication may be required in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact the Head of Chambers.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

If we cannot provide you with access to your personal information, we will try to inform you of the reasons why, subject to any legal or regulatory restrictions.

Your other legal rights

Data protection legislation also provides you with certain other rights. These are not always absolute rights and must be considered in the wider scope of the legislation. These rights are:

- right to erasure, also known as the right to be forgotten. The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing. In some circumstances this is not an absolute right;
- right to restrict processing. You have the right to 'block' or suppress processing of personal data. Again this is not an absolute right and will depend on the circumstances and any other legal/statutory obligations Chambers may have;
- right to data portability;
- right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- rights related to automated decision making including profiling.

Any questions you may have regarding the processing of your personal data should be directed at Head of Chambers.