



# ANCHOR

**ANCHOR LLP**

Privacy Policy June 2021

This document sets out how Anchor LLP collects and processes your personal data so that you are aware of how and why we are using your data. Our use of such data is in accordance with the UK General Data Protection Regulations ("the UK GDPR") and the Data Protection Act 2018 ("the DPA").

## INTRODUCTION

Anchor LLP is a Limited Liability Partnership registered in England and Wales with partnership number OC433990. We are authorised and regulated by the Solicitors Regulation Authority (SRA) with registration number 810352.

Anchor LLP is the Data Controller and responsible for your personal data (collectively referred to as "Anchor LLP", "we", "us" or "our" in this document).

If you have any questions in relation to this document, including any request to exercise your legal rights, please use the contact details set out below:

Full name of legal entity: Anchor LLP

Data Protection Officer: Andrew Rush

Email Address: [andrew.rush@anchor.co.uk](mailto:andrew.rush@anchor.co.uk) (please use the subject 'DPO Enquiry')

Postal Address: Unit 8 Park Lane Business Centre, Park Lane, Langham, Colchester CO4 5WR

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This document and our use of data generally is kept under frequent review. This version was updated on 17 June 2021.

## THE DATA WE COLLECT

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity data – including first name, maiden name, last name, title, date of birth and gender.
- Contact data – including email address, billing address, telephone numbers.
- Financial data – including bank account details.
- Transactional data – including details of transactions to and from you and other services we have provided.
- Technical data - including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage data – including information about how you use our website and services.
- Marketing and communications data – including your preferences in receiving marketing material from us and third parties and your communication preferences.

We also collect Aggregated Data such as statistical or demographic data for any purpose. This may be derived from your personal data but is not considered personal data by law. And does not directly or indirectly reveal your identity. However, if we combine Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this document.

If we use special categories of personal data and data relating to criminal convictions and offences it will normally be when this is necessary for the establishment, exercise of defence of legal claims or where we need to do so as an employer.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter with you. We may have to cancel a contract in these circumstances, but we will notify you if this is the case.

## HOW WE COLLECT PERSONAL DATA

We collect personal data through several means, including:

- Direct interaction – you may give us your personal data by filling in forms or correspondence with us by post, telephone, online, email or other. This includes personal data you provide when you apply for our services, subscribe to our services or publications, request marketing to be sent to you, enter a survey, or give us feedback.
- Automated technology or interaction – as you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other technologies. You can read our Cookie Policy on at [anchor.co.uk/cookiepolicy](https://anchor.co.uk/cookiepolicy).
- Third parties or publicly available sources – we may receive personal data about you from other sources such as financial organisations, other law firms, government agencies and regulatory bodies.

## HOW WE USE YOUR PERSONAL DATA

We will only use your data when the law allows us to. Most commonly we will use personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter or have entered with you.
- Where you subscribe to our marketing material.
- 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. Legitimate interests include managing payments, fees and charges, collecting money owed to us, keeping our records up to date and understanding how people use our services (including our website).
- Where we need to comply with a legal and regulatory obligations.

We do not rely on consent as a legal basis for processing your data other than in relation to sending third party direct marketing communications to you via email. You have the right to opt out of receiving marketing material at any time by contacting us.

We may share your personal data to relevant third parties as necessary to deliver services to you as contracted. These parties include:

- Our professional advisers and auditors.
- Regulatory authorities, courts, tribunals and law enforcement agencies.
- Third parties involved in hosting or organising events or seminars.

We do not usually actively transfer personal data outside the UK. However, some of our external IT providers are based or use servers outside the UK, so their processing of personal data may involve a transfer of data outside the UK. We ensure a similar degree of protection is afforded to this data by ensuring we only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data, or where we use certain service providers, by using specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

## DATA SECURITY

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instruction, and they are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data breach and will inform you and any relevant regulator in the event of a suspected data breach where we are legally required to do so.

## **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We may need to retain information for significant periods of time in order to establish, exercise or defend our legal rights, and for archiving and historical purposes. Where possible and practical, personal information will be rendered anonymous through the removal, substitution or blocking of details which enable individuals to be identified.

## **YOUR RIGHTS TO ACCESS PERSONAL DATA**

Under the UK GDPR and the DPA you have the rights:

- To be informed – this document fulfils our obligation to inform you of how we process personal data as a result of you engaging with our services, contacting us about our services, requesting marketing communication and or visiting our website.
- Of access - you have the right to request access to the personal data that we may hold about you.
- Of rectification – you have a right to request that any personal data is rectified if this is inaccurate or incomplete.
- To erasure – you have the right to request the erasure of your personal data where there is not a compelling reason for us to continue to hold this.
- To restriction of processing – you have the right to request that we block or restrict the processing of your personal data in certain circumstances.
- To data portability – you have the right to obtain and reuse your personal data for your own purposes across different services.
- To object – you have the right to object to the processing of your personal data on the grounds of legitimate interest. Where we can demonstrate compelling legitimate grounds for the processing, which overrides your interests, your personal data may continue to be processed.
- Related to automated decision-making including profiling – we do not subject your personal data to automated decision-making other than as part of the process of entering a contract. We may profile your personal data to better understand you as a client, including your other or future legal needs and to meet your reasonable expectations for relevant, timely and accessible communications from us. This is because it is in our legitimate business interest to provide you with timely information on service offerings you may need, in our attempt to engage, retain or re-engage you as a client, through legally compliant means.

You may contact us to exercise these rights using the contact details in his policy. We will aim to respond to all requests within one calendar month, but in some circumstances it may take us longer such as if your request is one of a series of requests, your request is particularly complex, you are requesting excision of multiple rights at once, or we are having difficulty verifying your identity. We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive (or we may refuse to comply with your request in these circumstances).

## **THE INFORMATION COMMISSIONER'S OFFICE**

The Information Commissioner's Office (ICO) is the UK supervisory authority for data protection issues. If you are not satisfied with our approach to personal data (including a response to a request to exercise rights), you have the right to make a complaint at any time to the ICO. However, we would appreciate the opportunity to discuss this with you first – so please contact us if you have concerns.

You can find out more about the ICO and its work on its website at [ico.org.uk](https://ico.org.uk).



[anchor.co.uk](https://www.anchor.co.uk)

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