

Frettens LLP client privacy notice

We need to collect and keep personal data about our clients and third parties connected to matters on which we are dealing to enable us to provide you with services. We are committed to keeping your data safe. This privacy notice tells you what we do with your personal information.

This notice is regularly reviewed. We may make changes to reflect the law and our processes. Please regularly check this notice for updates.

Contact details

Post: Frettens LLP, 11 The Saxon Centre, 11 Bargates, Christchurch, BH23 1PZ

Telephone: 01202 509102

Email: info@frettens.co.uk

What information we collect

We collect or use the following information:

- Names and contact details
- Addresses
- Gender
- Occupation
- Date of birth
- Marital status
- Identification documents
- Any other personal information required to comply with legal obligations
- Third party information (such as family members or other relevant parties)
- Account information
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Credit history and credit reference information
- Employment details (including salary, sick pay and length of service)
- Matter history
- Usage data (including information about how you interact with and use our website, products and services)
- Marketing preferences
- Information relating to compliments or complaints
- Audio recordings (eg calls)
- Records of meetings and decisions
- Correspondence
- Website user information
- Technical data, including information about browser and operating systems

Why we collect your information

We collect and use your personal information for the following reasons:

- To provide you with products and or services
- To improve our products and or services
- To assist with the operation of your client account
- To provide information updates or for marketing purposes
- To comply with legal requirements
- For archiving purposes
- To handle queries complaints or claims

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access**- You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. You can read more about this right here.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
 - This data enables us to take instructions from you, communicate with you and progress matters for you in order to fulfil the contract between us.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
 - The firm has a legal obligation to verify your identity and, in some cases, investigate source of funds and source wealth. We have a legal obligation to maintain these records. Please refer to the section below for further information about storage.
 - The firm has a legal obligation to prevent fraud.
 - The firm has a legal obligation to conduct politically exposed persons (PEPs) and sanctions checks. We are also required to conduct on-going monitoring for these purposes. Our electronic identification verification platform will continually monitor our clients and, where appropriate, third parties, for PEPs and sanctions matches.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - It is in our legitimate interests that personal data be collected to enable the firm to onboard you as a client. Part of the onboarding process involves carrying out a conflict check, for which this data is required.
 - Calls are recorded for audit, quality and training purposes. It is in our legitimate interests to audit/check the quality of calls to ensure standards are maintained.
 - It is in our legitimate interests that we update you with information that may be relevant to you following the closure of a previous matter. We will only use your information to send you updates that we consider are relevant to a matter in which we are currently acting, or have previously acted.
 - It is in our legitimate interests to use personal data for the purposes of dealing with queries, complaints or claims. This enables the firm to investigate appropriately and respond.
- Consent- we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you have the right to withdraw your consent at any time.

Where we get personal information from

- Directly from you
- Regulatory authorities
- Legal bodies or professionals (such as courts or solicitors)

How long we keep information

Personal information contained on matter files will be stored for a minimum of 6 years. In some cases this may be longer. This will depend on the matter on which we have acted for you. You will be notified at the end of each matter, how long that file will be held for.

We never delete your client contact record. It is in our legitimate interests to retain this data for conflict purposes.

Information stored in our marketing database is held whilst we have your consent to do so.

Who we share information with

Others we share personal information with

- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Insolvency practitioners
- Regulatory authorities
- External auditors
- Organisations we're legally obliged to share personal information with
- Suppliers and service providers

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us. Victoria Bailey is the firm's Compliance and Risk Manager and is responsible for investigating and responding to complaints relating to data protection. Complaints can be made by emailing vbailey@frettens.co.uk or by using the contact information contained at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>