

## MILLS & CO SOLICITORS LIMITED – PRIVACY NOTICE FOR BUSINESS CONTACTS, TO BE PROVIDED ON REQUEST

We process certain personal data about individuals who are not our clients, but with whom we would like to develop our business relationship.

### What do we collect?

We may collect the following kinds of information where relevant.

Types of data	Source
<p><b>Identity</b></p> <p>First name, last name, title, date of birth, gender, company name (if applicable)</p>	<p>The organisation for which a person works.</p> <p>Directly from the person concerned.</p> <p>Other professional advisers.</p> <p>Other parties involved in a client matter.</p>
<p><b>Contact</b></p> <p>Home and work addresses as appropriate, telephone and fax numbers, email addresses and any other appropriate contact details in the circumstances in question.</p>	<p>The organisation for which a person works.</p> <p>Directly from the person concerned.</p> <p>Other professional advisers.</p> <p>Other parties involved in a client matter.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p>
<p><b>Employment</b></p> <p>Organisation name, position/title, employment history, professional specialism, qualifications.</p>	<p>The organisation for which a person works.</p> <p>Directly from the person concerned.</p> <p>Other professional advisers.</p> <p>Other parties involved in a client matter.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p>
<p><b>Service history</b></p> <p>Details about services and products requested (value added services rather than legal services) or provided by us in the past.</p>	<p>Directly from the person concerned.</p> <p>The organisation for which a person works.</p>
<p><b>Marketing and communications</b></p> <p>Preferences on receiving marketing from us and communication preferences.</p>	<p>Directly from the person concerned.</p>

<p><b>Interests and engagement with the firm</b></p> <p>Professional and personal interests, requests made in the past, interaction and engagement with the firm eg. attendance at events.</p>	<p>Directly from the person concerned.</p> <p>The organisation for which a person works.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p> <p>Parties involved in one of our client matters.</p>
<p><b>Other</b></p> <p>We may from time to time receive other information from or about a person, for example if a person is due to join us at a sporting event but cannot because of an injury, or if we are given dietary preferences for catering purposes. Some of this may be 'special category personal data', for example if it indicates a health condition, or religion.</p>	<p>Directly from the person concerned.</p> <p>The organisation for which the person works.</p>

**How do we use personal data and on what lawful basis?**

We do not process 'special category' data as a matter of course, but where data may involve special category data we have included our lawful grounds for processing it.

Purpose	Type of data	Lawful basis for processing	Who we share it with
<p>To provide value added services such as legal updates and relevant events.</p>	<p>(a) Identity. (b) Contact. (c) Interests and engagement. (d) Marketing and communications (e) Other.</p>	<p>Necessary for our legitimate interest to develop business relationships in order for us to conduct a business which provides legal services.</p> <p>Necessary for our legitimate interest to provide value added services to clients and business contacts.</p> <p>Where we use emails for such communications and the person concerned is an individual, we first obtain consent.</p> <p><b>Special category personal data:</b> Explicit consent.</p>	<p>The organisation for which you work.</p> <p>Events service providers (for example catering and security staff, and premises providers if the event is off-site).</p> <p>Events partners (usually other law firms or professional service providers).</p>

<p>To make suggestions and recommendations about services (or goods) that may be of interest.</p>	<p>(a) Identity. (b) Contact. (c) Interests and engagement. (d) Marketing and communications. (e) Other.</p>	<p>Necessary for our legitimate interests to develop our business and provide value added services to clients and business contacts.</p> <p>Where we use emails for such communications and the person concerned is an individual, we obtain consent.</p>	<p>The organisation for which a person works.</p>
<p>To develop our business profile and analyse our business trends and profiles.</p>	<p>(a) Contact. (b) Interests and engagement. (c) Marketing and communications. (d) Other.</p>	<p>Necessary for our legitimate interest to develop our business which provides legal services.</p>	
<p>To update our records, to process for audit and insurance purposes, and to administer claims on our own behalf.</p>	<p>(a) Identity. (b) Contact. (c) Employment. (d) Marketing and communications. (e) Interests and engagement. (f) Financial. (g) Service history. (h) Other.</p>	<p>Necessary for our legitimate interests to conduct a business which provides legal advice to our clients and to handle cases on behalf of our clients or on our own behalf.</p> <p><b>Special category personal data/criminal records data:</b></p> <p>(a) Necessary for the purpose of or in connection with legal proceedings, legal advice.</p> <p>(b) Establishing/exercising or defending legal claims.</p> <p>(c) Necessary for the substantial public interest of exercising a right or complying with an obligation arising in connection with an insurance contract.</p>	<p>Our professional advisers.</p>
<p>To respond to any complaints.</p>	<p>(a) Contact. (b) Interests and engagement. (c) Other.</p>	<p>Necessary for our legitimate interests:</p> <p>(a) to improve our services and business development practices;</p> <p>(b) to develop business relationships in order for us to conduct a business which provides legal services.</p>	<p>The organisation for which a person works.</p> <p>UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the Solicitors Regulation Authority).</p>

To enable us to operate effective office facilities, including ensuring adequate security measures are in place.	(a) Identity. (b) Contact. (c) Employment. (d) Other.	Necessary for our legitimate interests to conduct a legal business by ensuring that our offices have effective administrative and security facilities in place.	Service providers employed in connection with office facilities, including security providers and postal service providers.
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**Marketing**

We aim to provide choices regarding certain personal data uses, particularly around marketing and advertising.

We may use Identity, Contact, Employment, Service history, Marketing and communications and Interests and engagement to form a view on what we think a person may want or need, or what may be of interest. This is how we decide which services, products (if applicable), and communications may be relevant to a person.

A person may receive marketing communications from us (such as legal update bulletins or event invitations) if she/he has requested information from us, previously instructed us, expressed an interest in a particular topic, if we have been provided with contact details by third party providers of contact lists, or if the person concerned knows one of our directors or employees and, in each case, if the person concerned has not opted out of receiving that marketing. Event invitations may be received from us if: (a) a business email address is publicly available; (b) an event is relevant to the organization of the person concerned; and (c) we think that that person is likely to have a genuine interest to attend.

**Third-party marketing: joint events**

From time to time we run events with organisations that we know. The event invitations will always make it clear who these event partners are.

We may share a person’s name, job title and the organisation for which that person works with such event partners in order to coordinate the guest list and facilitate event administration. We may also receive names, job titles, organisations and email addresses from such third parties in order to be able to send invitations for such joint events and facilitate event administration.

Once an invitation to one of our events has been accepted, we may send invitations for future events, make contact about relevant services we offer, and/or send bulletins and updates about issues which we think may be relevant and interesting.

Our lawful basis for sharing your email address with an event partner is that this is necessary for our legitimate interest to work with partners to promote our business and to provide you with added value services. You can opt out of receiving marketing communications from our event partners at any time by responding to the event partner directly or by emailing our Data Protection Contact, Tamsin Neale at [Tamsin.Neale@mills-co.com](mailto:Tamsin.Neale@mills-co.com).

**Opting out**

You can ask us to stop sending you marketing messages at any time by contacting Data Protection Contact at [Tamsin.Neale@mills-co.com](mailto:Tamsin.Neale@mills-co.com) or by using the 'unsubscribe' links in the emails which we send you. Where you opt out of receiving these marketing messages, this will not affect our communications with you in the course of providing our services.

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