

**MILLS & CO SOLICITORS LIMITED – PRIVACY NOTICE - CLIENT CONTACTS**

We process personal data about individuals who instruct us on behalf of organisations, individuals who work for such organisations, contractors and advisers of such organisations, and directors and shareholders of such organisations. We also process personal data about individuals who instruct us on their own behalf, though this is not the majority of our practice. This document includes information about both current and past clients.

**What do we collect?**

We may collect the following kinds of information about you where relevant.

Types of data	Sources
<p><b>Identity</b></p> <p>First name, last name, title, date of birth, gender, company name (if applicable), and in some cases photographic and residential identification documents.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</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 you work.</p> <p>Directly from you.</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 and qualifications.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</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 you have requested or we have provided to you or your organisation.</p>	<p>Directly from you.</p> <p>The organisation for which you work.</p>
<p><b>Marketing and communications</b></p> <p>Preferences on receiving marketing from us and communication preferences.</p>	<p>Directly from you.</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 e.g. attendance at events.</p>	<p>Directly from you.</p> <p>The organisation for which you work.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p> <p>Other parties involved in a client matter.</p>
<p><b>Financial</b></p> <p>In some limited circumstances where an individual's financial information is used or where the company's details can be said to be 'personal data', bank details and transaction history.</p>	<p>Directly from you.</p> <p>The organisation for which you work.</p> <p>Our bank.</p>
<p><b>Other</b></p> <p>Information we receive during the course of the provision of legal services to you or the organisation for which you work (this could be case matter-related or incidental to our business relationship with you), or the provision of value added services (such as special requirements for access, or dietary requirements, for our events).</p> <p>This may include 'special category' personal data, such as information about health, ethnic or racial origin or trade union membership, political opinions, religious or philosophical beliefs, and in more unusual cases (for example where included in an email in a disclosure exercise) sex life or sexual orientation. We are unlikely to receive biometric or genetic data. We may receive information about individuals' criminal records data if relevant to the interaction with the individual or the client matter.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</p> <p>Other professional advisors.</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>Private investigators.</p>

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

We do not process 'special category' personal data or criminal records data as a matter of course, but where we may receive such 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 open a new client file or matter file, including conducting the checks required by applicable laws and regulators, or to refresh such checks.</p>	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Employment.</p> <p>(d) Financial.</p> <p>(e) Service history.</p> <p>(f) Other.</p>	<p>(a) Compliance with our legal obligations.</p> <p>(b) Necessary for our legitimate interests to provide legal advice or to conduct legal cases on behalf of our clients.</p> <p><b>Special category personal data/criminal records data:</b></p> <p>(a) Necessary for the</p>	<p>The organisation for which you work.</p> <p>Where required as part of the conduct of the matter, or instructed by you, third parties and/or their professional advisors.</p> <p>UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the</p>

		<p>purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal claims.</p> <p>(b) Suspicion of terrorist financing or money laundering.</p> <p>(c) prevention or detection of unlawful acts</p>	National Crime Agency or the Solicitors Regulation Authority).
<p>Communicating with you on client matters in order to fulfil our instructions, otherwise provide legal advice, or to discuss our services or fees.</p>	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Service history.</p> <p>(d) Interests and engagement.</p> <p>(e) Other.</p>	<p>Necessary for our legitimate interests:</p> <p>(a) to provide legal advice or to conduct legal cases on behalf of our clients;</p> <p>(b) to develop business relationships in order for HFW to conduct a business which provides legal services.</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, or</p> <p>(b) establishing/exercising or defending legal claims.</p>	The organisation for which you work.
<p>The provision of legal services, such as the conduct of litigation, transaction services, or legal advice.</p>	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Service history.</p> <p>(d) Financial.</p> <p>(e) Other.</p>	<p>Necessary for our legitimate interests to provide 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, or</p> <p>(b) establishing/exercising or defending legal claims.</p>	<p>The organisation for which you work.</p> <p>Service providers engaged on behalf of your organisation.</p> <p>Where required as part of the conduct of the matter, or instructed by you, third parties and/or their professional advisors.</p> <p>Government bodies (such as HMRC), Regulators, Courts, tribunals, local authorities, the Land Registry, where required as part of the conduct of the matter.</p> <p>UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the Solicitors Regulation Authority or the National Crime Agency).</p>

To respond to any complaints or claims and to carry out customer satisfaction research.	(a) Contact. (b) Interests and engagement. (c) Other.	Necessary for our legitimate interests:  (a) to improve our services; (b) to develop business relationships in order for us to conduct a business which provides legal services.	The organisation for which you work.  UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the Solicitors Regulation Authority or the National Crime Agency).
To develop our business profile and analyse our business trends and profiles.	(a) Contact. (b) Service history. (c) Other.	Necessary for our legitimate interest to develop our business which provides legal services.	Compilers of legal directories (where you have agreed to be a referee).
To provide you with value added services such as legal updates and relevant events.	(a) Identity. (b) Contact. (c) Interests and Engagement. (d) Marketing and communications. (e) Other.	Necessary for our legitimate interest to develop business relationships in order for us to conduct a business which provides legal services.  Necessary for our legitimate interest to provide value added services to clients and business contacts.  Where we use emails for such communications and you are an individual, we first obtain your consent.  <b>Special category personal data/criminal records data:</b> Your explicit consent.	The organisation for which you work.  Events service providers (for example catering and security staff, and premises providers if the event is off-site).  Events partners (usually other law firms or professional service providers).
To make suggestions and recommendations to you about services (or goods) that may be of interest to you.	(a) Identity. (b) Contact. (c) Interests and engagement. (d) Marketing and communications. (e) Service history. (f) Other.	Necessary for our legitimate interest to develop our business and provide value added services to clients and business contacts.  Where we use emails for such communications and you are an individual, we obtain your consent.	The organisation for which you work.
To update our records, to process for audit and insurance purposes, and to administer claims on our own	(a) Identity. (b) Contact. (c) Employment. (d) Marketing and	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	The organisation for which you work.  Our professional advisors.  Government bodies (such as HMRC), Regulators, Courts,

behalf.	communications. (e) Interests and engagement. (f) Financial. (g) Service history. (h) Other.	own behalf. <b>Special category personal data/criminal records data:</b> (a) Necessary for the purpose of or in connection with legal proceedings, legal advice. (b) Establishing/exercising or defending legal claims. (c) Necessary for the substantial public interest of exercising a right or complying with an obligation arising in connection with an insurance contract.	tribunals, local authorities, the Land Registry, where required as part of the conduct of the matter.  UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the Solicitors Regulation Authority, or to the National Crime Agency).
To ensure that we receive payment.	(a) Contact. (b) Financial.	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.	Our service providers such as credit check agencies, counsel, local lawyers and debt collectors.
To comply with our legal and professional obligations, for example towards the Court, to comply with legislation on money laundering or terrorist financing, or to comply with privacy laws.	(a) Identity. (b) Contact. (c) Employment. (d) Marketing and communications. (e) Financial. (f) Service history. (g) Other.	Necessary to comply with our legal obligations. <b>Special category personal data/criminal records data:</b> (a) Necessary for the purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal claims. (b) Preventing or detecting unlawful acts.	The organisation for which you work.  Our professional advisers.  Government bodies (such as HMRC), Regulators, Courts, tribunals, local authorities, the Land Registry, where required as part of the conduct of the matter.  UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example the Solicitor's Regulation Authority, or to the National Crime Agency).
To enable third party service providers such as counsel or expert witnesses to carry out any of the purposes set out above on our behalf.	(a) Identity. (b) Contact. (c) Employment. (d) Marketing and communications. (e) Interests and engagement. (f) Financial. (g) Service history.	As above.	Service providers engaged on behalf of your organisation or on behalf of us.

	(h) Other.		
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.

## Marketing

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

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

You may receive marketing communications from us (usually legal update bulletins or event invitations) if you have requested information from us, previously instructed us, expressed an interest in a particular topic, or if you know one or more of our partners or staff and, in each case, if you have not opted out of receiving that marketing.

### 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 your name, job title and the organisation for which you work 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.

If you accept an invitation to one of our events we may send you invitations for future events, contact you about relevant services we offer, and/or send you bulletins and updates about issues which we think you might find relevant and interesting.

We will also share your contact data with our event partner so that the event partner can communicate with you after the event with information on how it can help you further. The name of the event partner(s) will be clear on the event invitation before you accept it. Our lawful basis for sharing your email address 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) with your preferences when you accept our invitation.

## Opting out

You can ask us to stop sending you marketing messages at any time by contacting our data protection contact, Tamsin Neale, 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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