## MILLS & CO SOLICITORS LIMITED - PRIVACY NOTICE - THIRD PARTIES INVOLVED IN CLIENT MATTERS

As part of the service our clients request, we process personal data about individuals who are involved directly or indirectly in client matters, whether transactional, litigious or regulatory.

Types of data	Sources	
Identity Data	The organisation for which you work.	
First name, last name, title, date of birth, gender,	Directly from you.	
company name (if applicable), and in some cases photographic and residential identification	Our client.	
documents.	Other professional advisers.	
	Other parties involved in a client matter.	
Contact Information	The organisation for which you work.	
Home and work addresses as appropriate,	Directly from you.	
telephone and fax numbers, email addresses and any other appropriate contact details in the	Our client.	
circumstances in question.	Other professional advisers.	
	Other parties involved in a client matter.	
	Public sources, such as information available from searching the internet or on business networking sites.	
Employment Information	The organisation for which you work.	
Organisation name, position/title, employment	Directly from you.	
history, professional specialism and qualifications.	Other professional advisers.	
	Other parties involved in a client matter.	
	Public sources, such as information available from searching the internet or on business networking sites.	
Interests and Engagement with the firm	Directly from you.	
Professional and personal interests, requests made	The organisation for which you work.	
in the past, interaction and engagement with the firm eg. attendance at events.	Public sources, such as information available from searching the internet or on business networking sites.	
	Our client or other parties involved in a client matter.	
Financial Data	Directly from you.	
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	Our bank.	
	The organisation for which you work.	
and transaction history.	Our client or other parties involved in a client matter.	

## Other Information

Information we receive during the course of the provision of legal services to our clients.

This will depend on the type of matter involved. This could be information which is incidental to witness statements, correspondence, transaction documents, court documents etc.

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 preferences. 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.

The organisation for which you work.

Directly from you.

Our clients.

Other professional advisers.

Other parties involved in a client matter.

Public sources, such as information available from searching the internet or on business networking sites.

Private investigators.

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

We do not process 'special category' 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
Communicating with you on our client's instructions in order to progress our client's matters.	(a) Identity. (b) Contact. (c) Any Other Data.	Necessary for our legitimate interests to communicate with third parties in order to enable us to provide legal advice or to undertake court or arbitration proceedings on behalf of a client.  Special category personal data/criminal records data:  Necessary for the purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.	The organisation for which you work. Our clients. Other professional advisers. Other parties involved in a client matter. Government bodies (such as HMRC), Regulators, Courts, tribunals, local authorities, the Land Registry, where required as part of the conduct of the matter.
Gather information relevant to our client's matters, or otherwise process your information to provide legal services to our clients.	<ul><li>(a) Identity.</li><li>(b) Contact.</li><li>(c) Any Other Data.</li></ul>	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.  Special category personal data/criminal records data:  Necessary for the purpose of	The organisation for which you work.  Service providers engaged on the behalf of your organisation.  Where required as part of the conduct of the matter, or instructed by you, third parties and/or their professional advisors.

		or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.	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 to the Solicitors Regulation Authority or the National Crime Agency).
To make or receive payments on our client's behalf.	(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 bank.  Service providers such as credit check agencies, counsel, local lawyers and debt collectors.
To update our records, to process for audit and insurance purposes, and to administer claims on our own behalf.	(a) Identity. (b) Contact. (c) Employment. (d) Marketing and Communications. (e) Interests and Engagement. (f) Financial. (g) Service. (h) Other.	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.  Special category personal data/criminal records data:  (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.	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 to the Solicitors Regulation Authority or the National Crime Agency).
To comply with our legal and professional obligations, for example towards the Court, to comply with legislation on money laundering or terrorist	<ul><li>(a) Identity.</li><li>(b) Contact.</li><li>(c) Employment.</li><li>(d) Marketing and communications.</li></ul>	Necessary to comply with our legal obligations.  Necessary for our legitimate interest to respond to relevant regulators and law enforcement authorities.  Special category personal	The organisation for which you work.  Our professional advisers.  Government bodies (such as HMRC), Regulators, Courts, tribunals, local authorities, the Land Registry, where required

financing, or to comply with privacy laws.	<ul><li>(e) Financial.</li><li>(f) Service history.</li><li>(g) Other.</li></ul>	data/criminal records data:  (a) Necessary for the purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.  (b) Preventing or detecting unlawful acts.	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 Solicitors Regulation Authority or 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.	<ul> <li>(a) Identity.</li> <li>(b) Contact.</li> <li>(c) Employment.</li> <li>(d) Marketing and Communications.</li> <li>(e) Interests and Engagement.</li> <li>(f) Financial.</li> <li>(g) Service.</li> <li>(h) Other.</li> </ul>	As above.	Service providers engaged on behalf of your organisation or on behalf of us.
To enable us to operate effective office facilities, including ensuring adequate security measures are in place.	<ul><li>(a) Identity.</li><li>(b) Contact.</li><li>(c) Employment.</li><li>(d) Other.</li></ul>	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.

Our data protect contact is Tamsin Neale (Tamsin.Neale@mills-co.com).

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