

Blaser Mills Law Client Privacy Notice

Dated: Jan 2024

Introduction

Blaser Mills Law respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you interact with us and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Blaser Mills Law collects and processes your personal data when you interact with us, including any data you may provide to us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Blaser Mills Law is the controller and responsible for your personal data (collectively referred to as “Blaser Mills”, “we” or “our” in this privacy notice).

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights please contact the data protection officer using the details set out below.

Contact details

Our full details are:	Blaser Mills Law
Full name of legal entity:	Blaser Mills LLP
Name or title of Data Protection Officer:	James Simpson
Email address:	jfs@blasermills.co.uk
Postal address:	40 Oxford Road High Wycombe HP11 2EE
Telephone number:	01494 478618

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated 23rd January 24

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.

Third-party links

When using our website, this may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username, employee number, passport number, driving licence number or similar identifier, marital status, gender, title, date of birth, employment history, educational or professional background, tax status, and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers. Financial Data includes bank account, payment card details and other data necessary for processing payments and fraud prevention including debit/credit card numbers, security code numbers, and other related billing information.
- **Business Data** includes information about your business and any information about your business provided to us in the course of us providing our services.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, device type, 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 our website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Physical Access Data:** information relating to your visits to us and our events.
- **Sensitive Personal Data:** in the course of us providing services (for example when providing employment, criminal, personal injury, trust and probate advice) we may collect and use sensitive personal data relating to you including information about your health, your ethnicity, your religious and political beliefs, your trade union membership, criminal convictions, sex life, sexuality and your genetic or biometric data.

We also collect and use **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a

specific website feature. However, if we combine or connect 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 privacy notice.

If you fail to provide personal data

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 that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to act for you in your legal case). In this case, we may have to cancel a service or retainer you have with us but we will notify you if this is the case at the time.

If you provide information about other people

If you provide such information, it is recommended that you ensure that they understand that their information is being shared, that they have consented to it being shared by you and you should also inform them as to how their information may be used.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** This is the most usual method. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Instruct us in relation to a legal matter;
 - Contact us by telephone, email or other means;
 - When you attend our offices or seminars or events;
 - Subscribe to our publications;
 - Browse or interact with our website or enquiry about our services or request marketing to be sent to you;
 - When you or your organisation contact us to market, sell or provide services to us;
 - Give us some feedback.
- **Automated technologies or interactions.** 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, and other similar technologies. Please see our cookie policy on our website for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below
- Identity and Contact Data from publicly available sources such as Companies House, electronic ID search agencies and the Electoral Register
- If relevant to your legal case for instance a personal injury matter, we may require to see your medical records

4. How we use your personal data

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deal with new enquiries and/or register you as a new client	(a) Identity (b) Contact	Performance of a contract with you and our legitimate interest to keep accurate records to follow up initial enquiries
To process and deliver the service including: (a) Acting for you in relation to your legal case	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) and (c) Necessary for our legitimate interests (to recover debts due to us)

(b) Manage payments, fees and charges (c) Collect and recover money owed to us		
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) to communicate with you and to keep you up to date with the latest developments (c) Asking you to complete or leave a review or take a survey.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To comply with our legal and regulatory obligations including: - Maintaining records Compliance checks Fraud and crime prevention	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and our website (including background checks, exercising or defending our legal rights, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To manage access to our premises and for security purposes	(a) Identity (b) Contact	Necessary for our legitimate interests (for running our business)
For insurance purposes	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to define types of work and customers to ensure the appropriate amount of insurance cover)

For employment purposes	(a) Identity (b) Contact (c) Profile	Performance of a contract
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

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

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data 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 products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by either logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by [contacting us](#) at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. For example, if you provide us with your ID on one matter and then you instruct another lawyer in relation to another matter, we may use the same ID to open the second matter.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in

compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the [Glossary](#).
- Third Parties including service providers in connections with the legal services we provide such as overseas lawyers, barristers, consultants, costs draftsmen, accountants, financial advisers, mediators, experts, translators, couriers both in and outside the EU
- With our clients and where permitted by law to others for the purposes of providing our services and legal advice;
- Third Parties for money laundering, financial checks, credit risk checks, fraud, fraud/crime prevention and regulatory bodies;
- With courts, tribunals, regulators, enforcement bodies, supervisory authorities, mediators, court appointed or agreed professional experts, government departments and officials or other such persons where it is reasonably necessary for services we provide or for the exercise or defence of our or our client's legal rights and obligations;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We may transfer your personal data outside the European Economic Area (**EEA**).

If we transfer your information to other countries, we will use, share and safeguard that information as described in this Notice. To provide legal and other services, we may transfer the personal information we collect to countries outside of the EEA which do not provide the same level of data protection as the country in which you reside and are not recognised by the European Commission as providing an adequate level of data protection. We only transfer personal information to these countries when it is necessary for the services we provide you, or it is necessary for the establishment, exercise or defence of legal claims or subject to safeguards that assure the protection of your personal information, such as European Commission approved standard contractual clauses

7. Data security

We have put 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 instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

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 and where required for Blaser Mills Law to assert or defend against legal claims until the end of the relevant retention period or until the claim in question have been settled.

Generally, where we have acted for you in relation to a legal matter we will retain client files for a minimum of six years.

Where you enquire about instructing us, or submit an enquiry, but do not formally instruct Blaser Mills, your details will be added to our database of prospective clients, which we will maintain for a period of 18 months, this will ensure that we maintain a record of your enquiry, in such instances where you return to instruct us within this timeframe.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are;

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.

- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact the data protection_officer as detailed above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#)

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers / independent controllers including; lawyers, bankers, auditors, and insurers providing consultancy, banking, legal, HR, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.