

Privacy Notice

WHAT IS THIS?

At Perilli & Ho Solicitors, we understand the importance of privacy and the trust you place in us when you share your information. We are dedicated to safeguarding the data you provide to us.

This policy outlines the procedures for processing personal data collected from you or provided to us by third parties. It details how this data is utilized, the circumstances under which it may be disclosed to others, and the measures taken to ensure its security. Additionally, it elucidates the rights you possess concerning the processing of your personal data by Perilli & Ho Solicitors.

Please note that this policy may undergo periodic updates in compliance with evolving privacy and data protection laws. We encourage you to revisit this page occasionally to stay informed about any changes. Any modifications impacting the processing of your personal data will be explicitly stated in the notice.

WHO WE ARE?

Perilli & Ho Solicitors is a registered limited company in England and Wales, bearing company number 13794037. Our registered office is located at First Floor, 60 Cheapside, London, EC2V 6AX. Perilli & Ho acts as a Controller of personal data and is registered with the Information Commissioner under registration number ZB318183.

As a law firm, Perilli & Ho primarily operates as a data Controller, determining the purposes and means of processing personal data collected. However, in rare circumstances, Perilli & Ho may act as a data Processor, processing personal data only upon documented instructions from another Controller.

Throughout this policy, references to "Perilli & Ho," "we," "our," or "us" pertain to the specific company serving as the Controller of your personal data.

UNDERSTANDING PERSONAL DATA

When we mention "personal data," we are referring to information that can directly identify you, such as your name, or indirectly identify you through a combination of certain characteristics and information already in our possession.

SOURCES OF INFORMATION

We may obtain information about you from yourself or third parties when representing you or a client. This may occur if you are employed by or hold a position within a client company, are a beneficiary of an estate or trust, or are involved as a party or witness in a litigation case.

USE OF THIRD-PARTY INFORMATION

When we receive information about you from a third party, we will utilize it solely for the purposes of the legal matter at hand and to fulfill any regulatory or legal obligations we are bound by.

You provide us with information about yourself in various ways, including when you inquire about our services, engage us for legal assistance, or submit information through our website (please refer to our Cookies policy), opt-in/consent forms, apps, or by contacting us via phone, mail, email, live chat, social media, or other means. This information encompasses additional details you may share with us throughout the duration of any legal proceedings.

INFORMATION WE RECEIVE FROM YOU OR OTHER SOURCES

We may receive information about you from third parties. For example:

Personal data:

- your contact details;
- identification information;
- financial or billing information;
- employment information; and
- any details from correspondence and information regarding a matter on which we advise our client, including for example:
 - biographical; or
 - personal/circumstantial details.

This information may be provided:

In transactional matters

We may receive information about you from various sources, including law firms, accountants, and other professional advisors who are representing you or our client in various legal matters. These matters may include:-

- ❖ Corporate transactions, where your details may be shared in an online data room by us or other advisors.
- ❖ Commercial or domestic property transactions.
- ❖ Family, trust, or probate matters.
- ❖ Due diligence processes.

In dispute resolution

Witnesses, law firms, counsel, experts and other professional advisors acting for you or for us on your behalf, or for third parties, where you or our client is a party to or otherwise concerned in the course of, for example:-

- ❖ mediation, arbitration and other forms of alternative dispute resolution;
- ❖ potential or actual litigation;
- ❖ disclosure, preparation or exchange of witness or expert evidence; or
- ❖ obtaining records such as employment, financial, health or education.

By customers of financial institutions

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- Banks, building societies and finance companies, where you are their customer/debtor, who are clients of ours or from whom we are given or request information.

By clients acting in a representative capacity

- Personal representatives, attorneys, trustees, deputies and litigation friends who may provide us with information in connection with a matter including litigation which we are conducting for a client.
- Friends, family members or colleagues who may provide information to us about you as part of the work we undertake for them, for example where you are or may be:-
 - a beneficiary of an estate or trust;
 - appointed by them in some representative capacity, such as executor; or
 - a party in or a witness to a dispute.

Our people

- Recruitment consultants who may provide information about you to us in relation to a potential job at Perilli & Ho.
- Employers who may provide a reference on you to us.
- Court agents, court officers (i.e. sheriffs and enforcement officers) or trace agents.

From regulators

- Regulatory bodies when making regulatory enquiries.
- Enforcement authorities including, when making enquiries into potential criminal offences, the Police.

Through referrals

- Professional advisers who may refer your case or matter to us.
- Any other introducer of a case or matter to us.

We may supplement the personal data collected from you with information from publicly available sources, such as information to validate your identity or address, or to perform a credit or an identity check.

INFORMATION WE AUTOMATICALLY COLLECT ABOUT YOU

We may automatically collect information about you which we may observe, detect or create without directly asking you to provide the information to us. In common with most other businesses, this will mainly include information gathered automatically through your use of our website or online services. The settings on our website allow you to reject the non-essential cookies. Please see our Cookies policy for further details.

MANDATORY INFORMATION

Please note that your provision of documents for identity verification purposes is necessary for us to comply with our legal and statutory obligations. Failure to provide these documents will mean that we are unable to undertake identity verification as required by Money Laundering Regulations 2017, as amended and the Money Laundering and Terrorist Financing

(Amendment) (EU Exit) Regulations 2020, and, subsequently, we will not be able to act for you or the organisation instructing us, as applicable.

TYPE OF PERSONAL DATA WE PROCESS ABOUT YOU

As a law firm dealing with cases and matters, we may process a range of personal data about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers (please note that not all categories may be applicable to you):-

Category	Personal data included in this category
Banking/Billing	information used to send/receive funds to/from you or that appears on your bills
Behavioural	your activities, actions and behaviours
Biographical	your life experiences and circumstances
Cardholder	your payment card details
Contact	information which can be used to address, send or otherwise communicate a message to you (i.e. email address, postal address, employer name and job title)
Correspondence	information contained in our correspondence or other communications with you or about you, or about our products, services or business
Employment	your previous, current or future employment details
Financial	Information of financial transactions, history, standing and forecasts including credit and other references
Geo-location	information which contains or reveals the location of your electronic device
Identification	information contained in a formal identification document or social security or other unique reference relating to you
Insurance	your insurance applications, policies and any information relating to your insurance claim
Legal	information from public and other records including Companies House, Land Registry, HM Courts & Tribunals Service, Government and Local authorities, Regulators and Enforcement agencies including relating to legal claims made by you or against you or the claims process
Monitoring	we may record phone or video calls and meetings and retain transcripts of dialogue i.e. livechat conversations, for our records or for training purposes. If you visit one of our offices, your image may be recorded on CCTV for security purposes
Sensitive/Special Categories of Personal Data	your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, any personal data that relates to your health, sex life, sexual orientation or criminal offences or records or any genetic or biometric data about you

HOW AND WHY WE USE YOUR PERSONAL DATA

We may use the information we collect about you in the following ways.

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Where it is necessary for us to perform a CONTRACT with you.

We may use and process your personal data where we have supplied you (or continue to supply you) with any legal services, where we have arranged for the supply of another firm's services to you, or where you are in discussions with us about a particular matter on which you are considering taking advice.

We will use your information in connection with the contract for the provision of services when it is needed to carry out that contract or for you to enter into it.

We may also use and process your personal data in connection with our recruitment activities, if you apply for a position with us (whether directly or through a third party) or send your details to us on a speculative basis.

Where we have a LEGITIMATE INTEREST

We may use and process your personal data where it is necessary for us to pursue our legitimate interests as a business for the following purposes;

- A. to carry out our conflict checks to ensure that we are able to provide services to you;
- B. to enter into and perform the contract we have with you or your business (where you are an employee or an owner of that business);
- C. to carry out work when instructed by another firm who is representing you;
- D. to assess and improve our service to clients or our clients' customers (where applicable) through recordings of any calls and livechat sessions;
- E. to pursue a legal claim on behalf of our clients (including debt recovery);
- F. for the prevention of fraud and other criminal activities;
- G. to verify the accuracy of the data that we hold about you and to create a better understanding of you as a client and our clients' customers (where applicable);
- H. to create a profile of you based on any preferences you have indicated to us to enable us to decide what products and services to offer to you for marketing purposes;
- I. to undertake analysis to inform our business and marketing strategy (this may include the use of your data once it has been anonymized)
- J. to inform you about relevant events, products, news updates and announcements you may be interested in;
- K. to manage and deliver internal projects for business improvement;
- L. for network and information security purposes to enable us to take steps to protect your personal data against loss or damage, theft or unauthorised access;
- M. to comply with a request from you in connection with the exercise of your rights (e.g. where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- N. to assist in the management of queries, complaints or claims;
- O. to notify you or your business of changes in the law that might affect you or your business; and
- P. for the establishment, exercise or defence of our legal rights.

WHERE REQUIRED BY LAW

Where you engage us to provide legal services to you, we will need to process your personal data and the personal data of third parties in order to comply with our legal obligations, for example under the Civil Procedure Rules or the Family Procedure Rules. We also have a legal

obligation to comply with the SRA's Codes of Conduct, the Law Society of Scotland rules and the Law Society of Northern Ireland rules.

It is also a legal requirement for you to provide us with information to verify your identity in connection with anti-money laundering and criminal financing legislation. We will use that information for the purpose of complying with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended and the Money Laundering and Terrorist Financing (Amendment) (EU Exit) Regulations 2020, (or such other legislation that may replace or supersede these Regulations from time to time) unless we have obtained your consent to use it for any other purpose.

We may use and process your personal data in order to comply with other legal obligations to which we are subject, as follows:-

- A. to maintain a register of corporate gifts and hospitality to comply with anti-bribery laws;
- B. to maintain a record of undertakings where you are either a beneficiary of an undertaking or the person obliged to perform it;
- C. to maintain a record of undertakings where Perilli & Ho is the giver or receiver of an undertaking;
- D. to comply with our other legal and regulatory obligations, e.g. undertaking conflict checks; and
- E. for the prevention of fraud and other criminal activities.

IN THE VITAL INTERESTS OF THE INDIVIDUAL

From time to time in the course of representing individuals who may be troubled, in danger, very young or otherwise unable to exercise due care for their own safety or where we genuinely believe there is an immediate risk of harm to an individual, we may in extreme circumstances use information about our client, or a person connected with them or a client's customer in order to take action to protect them.

Where you have provided CONSENT

We will seek consent from you where we wish to feature your identity in a published case study, press release, advertisement or testimonial or wish to include your image in a photograph or video in connection with public relations or promotional activities.

You have the right to withdraw your consent at any time. Please see *Withdrawing your consent* section for further details.

Special categories of personal data

We may need to use more sensitive personal data (known as "special categories of personal data") about you or others associated with you, e.g. your family/carers). We will only use this kind of information where:-

- we have your explicit consent; or
- it is necessary for us to use this information to protect your vital interests or those of another person where it is not possible to obtain consent; or
- it is necessary for us to do so in connection with the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; or

- in exceptional circumstances, another of the grounds for processing special categories of personal data are met, such as protecting the economic well-being of an individual at economic risk.

Where you have provided us with explicit consent to use special categories of personal data about you, you may withdraw your consent for us to use this information at any time. Please see *Withdrawing your consent* for further details.

Please note that if you choose to withdraw your consent for us to use special categories of personal data about you, this may impact our ability to provide legal or support services to you which may not be in your best interest.

USE OF ANONYMISED DATA

We may use data derived from the personal data we process for our legitimate business purposes including our commercial research, after it has been anonymised.

Anonymised data is data from which individuals cannot be identified or made identifiable neither by us nor anyone else. Anonymised data is not subject to data protection laws.

OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL DATA

Our work for you may require us to provide information to third parties who will use your information for the purposes of providing services to us or directly to you on our behalf. Such third parties may include for example insurers, payment processing, software providers and mailing services.

When we use third party service providers, we only disclose to them any personal data that is necessary for them to provide their services and we have an agreement in place that requires them to keep your data secure and not to use it other than in accordance with our specific instructions.

OTHERS INVOLVED IN YOUR CASE OR MATTER

Our work for you may require us to provide information to third parties such as law firms, accountants, counsel, expert witnesses, medical professionals and other professional advisers, who will use your information in connection with your case or matter (see paragraphs 12 to 13 for a list of third parties we deal with). They may provide their own services directly to you.

Where we are engaged by a third party such as a bank or lender in connection with your contract with them, we may share information you provide to us with that third party about the progress of the case.

Any third party to whom we disclose information about you will be under an obligation to keep your information secure and not to use it for any purpose other than that for which it was disclosed unless you agree with them otherwise.

OTHER WAYS IN WHICH WE MAY SHARE YOUR PERSONAL DATA

We may transfer your personal data to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal data if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to protect your vital interests,

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to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and clients. However, we will always take steps to ensure that your privacy rights continue to be protected.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us for our use is stored on our secure servers which are located within the UK. The third parties listed under Others who may receive and have access to your personal data may be located outside of the UK or they may transfer your data outside of the UK. Those countries may not have the same standards of data protection and privacy laws as in the UK, which means additional safeguards must be put in place.

We will not transfer your personal data to other countries unless we have in place appropriate safeguards, such as:-

- The countries where the data is transferred are covered by the UK adequacy regulations. These countries have been assessed and approved by the UK government as having adequate protection of personal data;
- The transfer is based on standard contractual clauses (SCCs) ensuring appropriate safeguards. This may include requiring the recipients of the data to protect your personal data to the same standard required in the UK;
- The transfer is based on a Derogation for specific situations, as permitted by the data protection law; or
- Where the recipient subscribed to a UK approved international framework, intended to enable secure international transfers.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA FOR

If we collect your personal data, the length of time for which we retain it is determined by a number of factors including the type of data, the purpose for which we use that data and our regulatory and legal obligations attached to this use.

We maintain internally a full schedule of types of data and the specified period of time for which we will retain this.

Typically, the retention criteria are as follows for the following data types:-

Data category / document	Retention period/criteria
Personal data	Retention period
Queries and claims	Minimum of 7 years
Potential instructions	6 months in conveyancing and 7 years in family and personal injury
Recruitment data	Up to 12 months after candidate application
For legal and regulatory requirements	Time periods above might vary depending on legal and regulatory requirements

The only exceptions to this are where:-

the law requires us to hold your personal data for a longer period, or delete it sooner;

you exercise your right to have the data erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see *Erasing your personal data or restricting its processing*); or

in limited cases, the law permits us to keep your personal data indefinitely provided we have certain protections in place.

YOUR RIGHTS

You have a number of rights in relation to your personal data under data protection legislation. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, or clarification to enable us to find your personal data. Except in rare cases, we will respond to you within one calendar month from either (i) the date that we have received your clarification; or (ii) we have confirmed your identity; or (ii) where we do not need to do this because we already have this information, from the date we received your request.

ACCESSING YOUR PERSONAL DATA

You have the right to ask for a copy of the data that we hold about you by emailing or writing to us at the address at the end of this policy. We may not be able to provide you with a copy of your personal data if it concerns other individuals or we have another lawful reason to withhold that data.

We may charge you a reasonable fee based on administrative costs if you request a copy of data we have previously provided to you or if your request is manifestly unfounded or excessive.

In line with our environmental commitments, we will try to provide you with a copy of your data by electronic means where this is possible, unless you have specified otherwise in your request.

CORRECTING AND UPDATING YOUR PERSONAL DATA

The accuracy of your data is important to us, therefore if you change your name or address/email address, or you discover that any of the other data we hold is inaccurate or out of date, please let us know by contacting us using the details set out at the end of this policy.

WITHDRAWING YOUR CONSENT

Where we rely on your consent as the lawful basis for processing your personal data, as set out under *How we use your personal data*, you may withdraw your consent at any time by emailing or writing to us at the address at the end of this policy. (Please use “Withdrawal of consent” as the subject heading of your email).

If you withdraw your consent, our use of your personal data up until you’re the date you withdrew your consent is still lawful.

OBJECTING TO OUR USE OF YOUR PERSONAL DATA

Where we rely on our legitimate interests as the lawful basis for processing your personal data for any purpose(s), as set out under *How we use your personal data*, you may object to our using your personal data for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process

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your personal data and where our interests override yours (e.g. in debt recovery), we will temporarily stop processing your personal data in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection legislation, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.

You may also contest a decision made about you based on automated processing by emailing or writing to us at the address at the end of this policy.

ERASING YOUR PERSONAL DATA OR RESTRICTING ITS PROCESSING

In certain circumstances, you may ask for your personal data to be removed from our systems by emailing or writing to us at the address at the end of this policy. Please note that this right is not an absolute right. Provided we do not have any continuing lawful reason to continue processing or holding your personal data, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal data where you believe our processing is unlawful, you contest its accuracy, you have objected to its use and our investigation is pending, or you require us to keep it in connection with legal proceedings. We may only process your personal data whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

TRANSFERRING YOUR PERSONAL DATA IN A STRUCTURED DATA FILE

Where we rely on your consent as the lawful basis for processing your personal data or need to process it in connection with your contract, as set out under *How we use your personal data*, you may ask us to provide you with a copy of that data in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file.

You can ask us to send your personal data directly to another service provider, and we will do so if this is technically possible. We may not be able to provide you with a copy of your personal data if this concerns other individuals or we have another lawful reason to withhold that data.

COMPLAINING ABOUT THE USE OF YOUR PERSONAL DATA

If you wish to complain about the way we use your personal data, you can e-mail us using the details set out at the end of this notice. If you are dissatisfied with our response to your complaint and remain concerned about the way we have processed your personal, you have the right to complain to the Information Commissioner's Office (ICO) data or seek to enforce your rights through a judicial remedy. Please visit the <https://ico.org.uk/> for further details.

HOW WE PROTECT YOUR PERSONAL DATA

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website and any transmission is at your own risk. Once we have received your personal data, we have in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

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Where we collect any special categories of personal data about you, we will apply additional security controls to protect it.

Where we have given you (or where you have chosen) a password which enables you to access any of our online or electronic resources, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites run by other organisations. Please see our Cookies policy. This policy does not apply to those other websites, so we encourage you to read their privacy statements. We are not responsible for the privacy policies and practices of other websites even if you access them using links that we provide, and their security cannot be guaranteed.

If you linked to our website from a third-party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party website and recommend that you check the policy of that third-party website.

USE OF 'COOKIES'

Like many other websites, our website uses digital cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our website). 'Cookies' are small pieces of information sent to your computer and stored on its hard drive to allow our website to recognise you when you visit. Our settings for cookies enable you to reject the non-essential cookies.

It is also possible to switch off cookies by setting your browser preferences. Please note that this may impact functionality of some webpages and your browsing experience. For more information on how we use cookies and how to switch them off, please see our Cookies policy.

CONTACT US

If you wish to contact us with any queries about this Notice or about the way we process your personal data, you can contact the Data Protection Officer, Elaine Tse, who can be reached at etse@perilliho.com and/or our firm's Compliance Officer mlau@perilliho.com.