

Harrop Legal

PRIVACY NOTICE

1. WHO WE ARE

We are Harrop Legal, incorporated and registered in England and Wales with company number 17232892, whose registered office is at The Studio, Elysian House Elkstone, GL53 9PB (“we” and/or “our”). We also trade as Harrop & Co.

This privacy policy explains how we manage your personal data, under the UK General Data Protection Regulation (UK GDPR).

This policy applies to personal data processed by or collected on behalf of Harrop Legal. We may collect information from you when you visit our website, contact us by email or receive a communication from us relating to our services.

Harrop Legal is a “controller” as defined in the UK GDPR and the Data Protection Act 2018 and is responsible for your personal data. As controller, we are responsible for ensuring compliance with applicable data protection legislation.

There may be additional controllers involved in processing your data, and these are set out in this Policy, or you will be advised accordingly at the time of collection.

2. WHAT PERSONAL DATA WE COLLECT?

The personal data we collect from you will vary by activity, and is set out below. However, generally the personal data we collect will fall into the following categories:

- **Identity data** including name, date of birth and/or age, passport or identity documentation;
- **Contact data** including your address, telephone numbers and email address;
- **Payment data** including details of any payment details;
- **Technical data** including details of the devices you use to access our website, your Internet Protocol (IP) address, operating system and browser type (please refer to our Cookie policy for more information);
- **Usage data** including how you use the service and website;
- **Marketing and communications data** including your preferences in receiving marketing from us and your communication preferences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We collect personal data directly from you in different ways, including:

- When you provide it on our website www.harropco.com;

- When you make a payment;
- Information we gather from you during use of our serves;
- Information you provide when you interact with us by telephone, email, letters or other communication means;

4. WHY WE USE YOUR DATA AND OUR LEGAL BASIS FOR DOING SO

We are required to provide the legal justification for processing your personal data, in respect of each specific purpose. The table below displays the type of personal data collected for each purpose and a legal basis for processing that data.

Purpose/Activity	Type of data	Legal basis for processing (including basis of legitimate interest)
Provide Service	User data Usage data Address data Payment data	Performance of Contract
Process payments	User data Payment data	Legitimate Interest
Compliance with legislation, regulations or law enforcement	User data Usage data Address data Payment data	Compliance with legal obligations
Commencement or defence of claims	User data Usage data Address data Payment data	Legitimate Interest
Fulfilment of contractual obligations with third parties	User data Usage data Payment data	Legitimate Interest
Obtaining consent e.g., Cookies	User data Usage data	Consent

5. SPECIAL CATEGORY INFORMATION

The UK GDPR defines special category data as personal data that reveals: racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric

data, health data, sex life and sexual orientation. We do not process any special category personal data.

6. HOW AND WHEN CAN YOU WITHDRAW YOUR CONSENT?

Much of what we do with your personal data is not based on your consent and is instead based on other legal grounds (as set out above).

Where processing is based upon your consent, you have the right to revoke consent to future processing at any time. You can do this by contacting us using the details set out in subsection 12. The consequence may be that we are unable to send you some marketing communications and not all website functions may be available to you.

7. WHO WE MIGHT SHARE YOUR DATA WITH?

So that we can provide our service, meet our legal obligations and operate our business, we may need to share your personal information with the following third parties in the following circumstances:

- With other companies in order to provide our services.
- With companies whom we have contracts in place for provision of our service, such as website suppliers or market research companies engaged to develop our service.
- We may also disclose your personal data to our appointed representatives in connection with a contract between you and Harrop Legal. This may include legal advisors, debt collection agencies and any party described in an agreement we have with you. We will have in place an agreement with our service providers which will restrict how they are able to process your personal data.
- With other organisations to facilitate a transaction.
- With any law enforcement agency, where legally required to do so.
- Companies you ask us to share your data with.

Where we share your personal data with third party organisations, we are required to inform you of how they will use your personal data to perform their services or functions as controllers in their own right. Any privacy notices from third party organisations are separate to Harrop Legal.

8. TRANSFERRING DATA OUTSIDE OF THE UK

We will not transfer the personal information we collect about you outside the UK.

9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

As required by the UK GDPR, personal information is only retained for so long as is necessary to fulfil the purposes it was collected for. It will then be safely disposed of.

In some circumstances, your personal data may be anonymised so that it can no longer be identified to you, and this may be used indefinitely without notice.

10. YOUR RIGHTS

All individuals have certain rights under data protection law, with respect to their personal information. These rights do not apply in every circumstance. Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

In the event that you wish to exercise any of these rights or raise a complaint, you should contact us using the information set out at Paragraph 12 below.

11. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used in an unauthorised manner, altered or disclosed. Additionally, we restrict access to your personal data to those employees, contractors or other third parties who have a business need to know. Your personal data will only be processed upon our instruction and any individual with access will be subject to a duty of confidentiality. Although we take appropriate steps to protect your personal data, we cannot guarantee that your personal data will not become accessible to unauthorised persons, and we cannot be held responsible for any actions resulting from a security breach when information is supplied over the internet or any public computer network.

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.

12. CONTACT US

Any questions, requests or complaints should be directed to the Data Protection Officer at Harrop Legal: sarah.kenshall@harroplegal.com

If we are unable to resolve your concerns or you are not satisfied with the outcome, you can contact the Information Commissioner's Office:

Information Commissioner's Office
Wycliff House
Water Lane
Wilmslow
Cheshire
SK9 5AF

www.ico.org.uk

Tel: 0303 123 1113