

Hugh Thompson Notary Privacy Policy

The website (www.luptonfawcett.law) is the property of Lupton Fawcett LLP, a limited liability partnership registered in England and Wales. More information about Lupton Fawcett LLP can be found [here](#).

All references to 'we' 'us' or 'our' means Hugh Thompson Notary and Lupton Fawcett LLP and includes any Partner and/or employee of Lupton Fawcett LLP.

We are committed to ensuring that your privacy is protected, respected and dealt with in accordance with applicable laws.

This Privacy & Cookies Policy, together with the Terms and Conditions of Hugh Thompson Notary explain how we will use and protect any personal data that we collect from you or that you provide to us ('your personal data').

Data protection

For the purpose of all data protection legislation applicable to us, Hugh Thompson Notary and Lupton Fawcett LLP are the joint data controllers of your personal data.

Hugh Thompson Notary is registered with the Information Commissioner's Office Register of Data Controllers under registration number C1054441

Lupton Fawcett LLP is registered with the Information Commissioner's Office Register of Data Controllers under registration number Z9366055.

Information we collect about you and how we collect it

We collect personal data in various ways. The personal data collected will be determined by the method used to collect it. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes a billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **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, 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 websites.
- **Profile Data** includes your use of our services, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our websites, services and products.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Notarial Matter Data** includes information about you given to us in relation to your notarial.

We also collect, use and share **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 type of 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 provide you with notarial services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

Why we collect your personal data and how it is used

We collect your personal data for a variety of reasons which will depend upon your relationship with us.

We are under an obligation to only process your personal data where there is a legal basis for it.

How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact, Financial and Notarial Matter Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - wish to become an employee, to process your application
 - are an employee, to administer your employment in accordance with our HR Policy
 - request or use our services;
 - subscribe to our publications or attend a seminar;
 - request marketing to be sent to you;
 - enter a survey; or
 - give us some feedback.
 - wish to become our supplier, to perform the contract with you for your supply of goods and services to us
- **Automated technologies or interactions.** As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policies on our websites for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - **Technical Data** from the following parties:
 - analytics providers such as Google Analytics based outside the EU; and
 - online verification search providers based inside the EU;

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
- Identity and Contact Data from data brokers or aggregators based inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register, based inside the EU.
- Notarial Matter Data from publicly available sources such as the Land Registry and the Intellectual Property Office, based inside the EU.
- Notarial Matter Data from third parties involved in your matter.

How we use your data

Occasionally we will be required to use information that is provided to us to comply with our overriding obligations to external authorities. As such we may, in certain circumstances be required to disclose your information in the prevention of a crime or to comply with any legal or regulatory compliance obligations imposed upon us, for example by the Solicitors' Regulation Authority.

If you submit sensitive personal data to us (being information concerning your racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexuality, commission of criminal offences and/or involvement in criminal proceedings) we will keep this information confidential and only use where there is a legal basis to do so or where you have provided your consent.

Any third party suppliers instructed on our behalf will be required to enter into a confidentiality agreement and to process your personal data in accordance with our instructions. This agreement will also ensure that your personal data is stored within a system that is at least as secure as our own, to ensure that all necessary steps are taken to protect it.

Below, you will find a description of the ways we may 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

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client, including: (a) checking your identity for the money laundering regulations	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To deliver our services to you, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Notarial Matter (d) Financial (e) Transaction (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary to establish, exercise or defend legal claims (d) Consent
To manage our relationship with you, which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

<p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a seminar or event, or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>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)</p>
<p>To use data analytics and call tracking to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p> <p>(c) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To determine our services;</p> <p>To improve our services;</p> <p>To resolve complaints;</p> <p>By recording telephone conversations, if appropriate</p> <p>By monitoring and recording telephone enquiries</p>	<p>(a) Notarial Matter</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p> <p>(f) Marketing and Communications</p>	<p>Consent</p> <p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of Hugh Thompson Notary or Lupton Fawcett LLP for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at: getintouch@luptonfawcett.law or by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

Where you opt out of receiving marketing communications, this will not prevent us from continuing to process personal data provided to us as a result of a service we have provided to you or where other lawful processing grounds continue to apply.

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 below:
 - Service providers acting as processors based in India and the EU who provide administration and support services.
 - Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom or elsewhere, who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities based in the United Kingdom or elsewhere who require reporting of processing activities in certain circumstances.
- Third parties involved in your notarial matter, such as courts, barristers, experts, costs draftsmen, official bodies, other solicitors, translators, Embassies, Consulates and High Commissions and other advisors.
- 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.

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

Where we store your information and how we protect it

We store and retain information in the United Kingdom. We retain your personal data in various forms:

Type of Storage	Protection
Paper.	Client and employee files are stored in cabinets.
Electronic copies	We store all client information in our client management system which is held securely on our servers.

We will not transfer your data outside of the United Kingdom without seeking your prior written consent. We take responsibility for the security of information in our possession, however, we cannot guarantee the security of information in transit to us electronically as transmission of information via the internet is not completely secure or under our control.

How long we will keep your information

We will keep your information for as long as is reasonably necessary. This is dependent upon the nature of the information provided.

Type of data subject	Duration retained
Prospect	Personal data will be retained until you unsubscribe and no longer wish to receive our marketing materials.
Prospective employee	We will retain your data and the information that you provide us on your CV until 31st December in the second full year after receipt by us of it. Where you have been selected for interview we shall retain your information for 2 years.
Employees	Personal data will be retained in accordance with our HR Policy
Potential client enquiries	If you are seeking notarial advice and ultimately decide not to instruct us, we will retain your information for a period of 12 months and will delete it securely and confidentially thereafter. If your enquiry becomes an instruction, we will retain your information in accordance with our internal archiving policies and procedures. We will advise you of the same in correspondence. If we have monitored or recorded any calls, then this will be deleted after 30 days.
Clients	Appropriate personal data will be stored for a minimum period of 12 years.
Suppliers	Appropriate personal data will be stored for a period of 6 years or such period we deem appropriate after the end of the contract period depending on the nature of the contract between the us and the client.

All personal data that is disposed of by us will be carried out in a secure manner. Paper-based files will be securely shredded; electronic copies of information will be permanently deleted from our system.

Your rights

Data protection legislation provides individuals with the right to see what information organisations hold about them. This is known as a 'subject access request'.

If you would like to make a subject access request to Hugh Thompson Notary please write to Hugh Thompson, The Data Protection Officer, Hugh Thompson Notary, c/o Lupton Fawcett LLP, Yorkshire House, East Parade Leeds LS1 5BD or email to hugh.thompson@luptonfawcett.law

If you would like to make a subject access request to Lupton Fawcett LLP please write to Kathryn Sykes, The Data Protection Officer, Lupton Fawcett LLP, Yorkshire House, East Parade, Leeds LS1 5BD or email to law@luptonfawcett.law

You may have the right to request that we delete the information that we hold about you. This doesn't apply in all circumstances, in particular, those in which we may require your information to enable us to comply with a legal or compliance obligation.

In circumstances where you believe that the information that we hold about you is incorrect, please advise accordingly and we will update our records within one month (or two months if your request is complex).

Cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

If you are using our websites we will automatically obtain information from you as part of that visit. This information will not identify you, however, will allow us to:

- administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our sites to ensure that content is presented in the most effective manner for you and for your computer;
- allow you to participate in interactive features of our service when you choose to do so;
- as part of our efforts to keep our sites safe and secure;

You can find more information about the individual cookies we use and the purposes for which we use them below:

Cookie	Purpose	More information
DSID, IDE	Google's 3rd party advertising (DoubleClick). DoubleClick uses cookies to improve advertising.	
_ga, _gid, _gat	We use Google Analytics to analyse the use of our websites. Google Analytics gathers information about website use by means of cookies. The information gathered is used to create reports about the use of our websites.	Google's privacy policy is available at https://www.google.com/policies/privacy/

_twitter_sess, ads_prefs, csrf_same_site, csrf_same_site_set, dnt, eu_cn, external_referer, guest_id, kdt, lang, personalization_id, remember_checked_on, remember_checked_on, twid	Various cookies set by twitter.com in order for us to integrate with Twitter and embed our latest tweets into our websites.	
mhVisitorId	Unique and anonymous visitor ID used by the Mediahawke service. This cookie allows us to allocate a unique inbound phone number for each website visitor. All data collected via this method is anonymous.	
cookies_consent	We check for the existence of this cookie on your device to check if you have previously accepted our cookie policy. No personal or identifying information is stored. This cookie allows us to prevent our cookie popup from displaying if you have previously accepted it.	

You can restrict or block the cookies used by our sites through your browser settings but this will impact your user experience. The 'Help' function within your browser should tell you how.

Alternatively, you can visit www.aboutcookies.org which provides directions on how to block cookies on all major browsers. The site also explains how you can delete cookies that have already been stored on your computer and provides general information about cookies.

You should be aware that restricting cookies may impact on the functionality of the websites you visit.

Links to other websites

Our websites may contain links to other websites. These websites will have their own privacy policies for which we do not accept any responsibility. This policy does not extend to your use of any other website or to any information you may provide or may be collected by any other website.

Restricted areas

Certain areas of our websites may be restricted to access by authorised persons only. If you believe that you have been granted access to any document or file by mistake please leave the restricted area immediately and contact us by email at law@luptonfawcett.law as soon as possible.

Documents and files hosted on the restricted areas of our websites are confidential. If you believe that you have been granted access to a document or file by mistake you must not download it or use it and you must not disclose the contents to any other person. We reserve the right to remove you from the authorised list of users for any restricted area of our websites at any time.

Changes to this policy

This policy may change at any time. You should check this page periodically in order to ensure that you are aware of any changes. If we make any substantial changes we will notify you by posting a prominent notice on our websites.

Direct marketing

Lupton Fawcett issues communications to prospects, contacts and clients by email and mail. Lupton Fawcett will only do this where you have opted in to receive them or a legitimate interest has been identified.

To confirm your desire to receive such communications please use the link below to confirm, along with your preferences.

If at any time you wish to opt-out of receiving these materials, you are able to do so by emailing us at getintouch@luptonfawcett.law or by mailing us at: BD&M Team, Lupton Fawcett, Yorkshire House, East Parade, Leeds, LS1 5BD or by calling us on 0113 2802040.