



1. PURPOSE OF THIS PRIVACY STATEMENT

Welcome to the Progression Solicitors' Privacy Statement.

At Progression we respect your privacy and are committed to protecting your personal data.

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).

Our privacy statement explains how we collect, process and look after your personal data and provides details of the privacy rights available to all individuals under the General Data Protection Regulations (GDPR).

It is important that you read this privacy statement together with any other privacy statement or fair processing statement 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 statement supplements the other notices and is not intended to override them.

This Privacy Statement explains how we handle the personal data of our clients and also how we handle the personal data of:

- beneficiaries;
- people who apply for a job with us;
- our suppliers;
- any visitors to our website; and
- people who engage with us on Social Networking sites.

2. DATA CONTROLLER

Progression Solicitors Limited is the Data Controller.

ICO Registration Number: Z2726341

Our contact details are:

Progression Solicitors
11 Queen Street
Ulverston
Cumbria
LA12 7AF

Telephone: 01229 580956
Fax: 01229 484383

Email: Info@progressionsolicitors.com

Web: www.progressionsolicitors.com

3. DATA PROTECTION REPRESENTATIVE

We have appointed a Data Protection Representative who is responsible for overseeing any questions you may have in relation to this Privacy Statement.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our Data Protection Representative, using the details set out below:

Michele Ashton
Progression Solicitors
11 Queen Street
Ulverston
Cumbria
LA12 7AF

Telephone: 01229 580956

Email: Michele.Ashton@progressionsolicitors.com

4. CHANGES TO THIS PRIVACY STATEMENT AND YOUR DUTY TO INFORM US OF CHANGES

This Privacy Statement has been produced on 10th May 2018 to comply with the General Data Protection Regulations (GDPR) which will become UK Law on 25th May 2018.

It is important that the personal data which we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

5. DATA PROTECTION PRINCIPLES

We will comply with the GDPR. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

6. LEGAL BASIS FOR COLLECTING PERSONAL DATA

We have several legal bases for collecting and processing your personal data which are set out below:

6.1 Legitimate Interest

This means the interest of our business in conducting and managing our business to enable us to give you the best service 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 our Data Protection Representative.

6.2 Performance of Contract

This 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.

6.3 Comply with a legal or regulatory obligation

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

6.4 Consent

Generally, we do not rely on consent as a legal basis for processing personal data other than in relation to sending direct marketing communications via email or text message.

You have the right to withdraw consent to marketing at any time by contacting our Data Protection Representative.

7. CATEGORIES OF PERSONAL DATA

7.1 Our Clients:

We may collect, use, store and transfer different kinds of personal data about our clients:

- **Identity Data**, which includes first name, maiden name, last name, marital status, title, date of birth and gender, National Insurance Number and proof of identity;
- **Contact Data**, which includes postal address, email address and telephone numbers; and
- **Financial Data**, which includes bank account, credit card information and payment details.

In order to provide our clients with legal advice or perform a legal service, we may also need to collect the following categories of personal data:

- Family and lifestyle details;
- Asset details including details of bank accounts, property and liabilities;

- Income details including wage and benefits information; and
- Special categories of personal data, including details concerning our clients' racial or ethnic origin, Religious or philosophical beliefs, health, sexual orientation and sex life and any criminal history.

7.2 Beneficiaries:

We may collect, use, store and transfer different kinds of personal data about beneficiaries:

- **Identity Data**, which includes first name, maiden name, last name, marital status, title, date of birth and gender, National Insurance Number and proof of identity;
- **Contact Data**, which includes postal address, email address and telephone numbers; and
- **Financial Data**, which includes bank account, credit card information and payment details.

7.3 Company Secretaries and Directors

We may collect, use, store and transfer different kinds of personal data about the Secretaries and Directors of Companies we act for:

- **Identity Data**, which includes first name, maiden name, last name, marital status, title, date of birth and gender, National Insurance Number and proof of identity; and
- **Contact Data**, which includes postal address, email address and telephone numbers.

7.4 Job Applicants

We may collect, use, store and transfer different kinds of personal data about people who apply for a job with us:

- **Identity Data**, which includes first name, maiden name, last name, marital status, title, date of birth and gender, National Insurance Number and proof of identity;
- **Contact Data**, which includes postal address, email address and telephone numbers;
- **Education and Training Data;**
- **Membership of Professional Bodies Data;** and
- **Employment Data**, including employment history and references.

7.5 Our Suppliers

We may collect, use, store and transfer different kinds of personal data about our suppliers, including expert witnesses, counsel, underwriters and other professional advisors:

- **Identity Data**, which includes first name, maiden name, last name, marital status, title, date of birth and gender, National Insurance Number and proof of identity;
- **Contact Data**, which includes postal address, email address and telephone numbers;
- **Financial Data**, which includes bank account, credit card information and payment details;
- **Education and Training Data;**
- **Membership of Professional Bodies Data;** and
- **Employment Data**, including employment history and references.

7.6 Visitors to Our Website

We may collect, use, store and transfer different kinds of personal data about visitors to our website:

- Device details;
- User activity details and user preferences;
- Browser history details;
- Location details; and
- Electronic identification data including IP address and information collected through cookies.

8. WHAT HAPPENS IF YOU FAIL TO PROVIDE US WITH PERSONAL DATA?

Where we need to collect personal data about you under the terms of our contract or by law (for example to comply with anti-money laundering regulations), if you fail to provide that data when requested, we may not be able to provide you with a legal service. In this case, we may have to cancel the service but we will notify you if this is the case at the time.

9. HOW DO WE COLLECT YOUR PERSONAL DATA?

9.1 Our Clients:

We use different methods to collect data from our clients, including through:

- **Direct interactions:**

Clients give us personal data by filling in forms, by meeting with us in person or by corresponding with us by post, phone, email or otherwise.

- **Third parties:**

We may also receive personal data about our clients from various third parties including Her Majesty's Courts Service, counsel instructed to represent the client at court, opposing solicitors or counsel, the Local Authority, CAF/CASS, the Police and expert witnesses.

- **Publicly available sources:**

We may also receive personal data about our clients from public sources including Company's House.

9.2 Beneficiaries

We may receive personal data about a beneficiary from our clients. Beneficiaries also give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise.

9.3 Company Secretaries and Directors

We may receive personal data about Company Secretaries and Directors from our clients. Company Secretaries and Directors may also give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise.

9.4 Job Applicants

Job Applicants may give us personal data by filling in job application forms, by corresponding with us by post, phone, email or otherwise and by meeting with us in person at interviews.

9.5 Our Suppliers

Our Suppliers may give us personal data by meeting with us in person or by corresponding with us by post, phone, email or otherwise.

9.6 Visitors to our Website

Visitors to our website may give us personal data by virtue of using the website www.progressionsolicitors.com.

10. HOW DO 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.

11. PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA?

The tables below describe the ways in which we 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 the data.

Please contact our Data Protection Representative 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.

11.1 Our Clients:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register a new client and maintain accurate client records.	<ul style="list-style-type: none">• Identity• Contact	Performance of a contract Necessary for our legitimate interests (to keep our records updated and accurate and to facilitate future conflict of interest searches) Necessary to comply with a legal obligation
To ensure legal and regulatory compliance, including complying with audits and	<ul style="list-style-type: none">• Identity• Contact	Performance of a contract Necessary for our legitimate interests (to keep a

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
detecting and preventing fraud.		record of regulatory compliance) Necessary to comply with a legal obligation
To provide the client with the required legal service.	<ul style="list-style-type: none"> • Identity • Contact • Financial • Family and lifestyle • Assets • Income • Special Categories 	Performance of a contract Necessary for our legitimate interests (to keep a record of the legal service provided) Necessary to comply with a legal obligation
For account management purposes including, managing payments, fees and charges, collecting and recovering money owed to us and making statutory returns.	<ul style="list-style-type: none"> • Identity • Contact • Financial 	Performance of a contract Necessary for our legitimate interests (to recover debts due to us) Necessary to comply with a legal obligation
To manage our relationship with our clients which will include: (a) Notifying clients about changes to our terms of reference or privacy policy; (b) Asking clients to take a satisfaction survey.	<ul style="list-style-type: none"> • Identity • Contact 	Performance of a contract Necessary for our legitimate interests (to keep our records updated and to obtain client feedback so as to improve our services) Necessary to comply with a legal obligation
To make suggestions and recommendations to our clients about services or news that may be of interest to them.	<ul style="list-style-type: none"> • Identity • Contact 	Necessary for our legitimate interests (to develop our products/services and grow our business)

11.2 Beneficiaries

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To allow us to provide the required legal service.	<ul style="list-style-type: none"> • Identity • Contact • Financial 	Performance of a contract Necessary for our legitimate interests (to keep a record of the service provided and any funds / assets distributed from an estate) Necessary to comply with a legal obligation

11.3 Company Secretaries and Directors

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To allow us to provide the required legal service.	<ul style="list-style-type: none"> Identity Contact 	<p>Performance of a contract</p> <p>Necessary for our legitimate interests (to keep a record of the service provided and keep our records up to date)</p> <p>Necessary to comply with a legal obligation</p>

11.4 Job Applicants

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To progress the recruitment and selection of employees.	<ul style="list-style-type: none"> Identity Contact Financial Education and training Membership of Professional bodies. Employment history and references. 	Necessary for our legitimate interests (to develop our business)

11.5 Our Suppliers

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To evaluate potential suppliers, obtain products and services and for vendor administration, order management, and accounts payable.	<ul style="list-style-type: none"> Identity Contact Financial Education and training details; and Membership details of Professional bodies. 	<p>Performance of a contract</p> <p>Necessary for our legitimate interests (to ensure that any suppliers used are suitably qualified and experienced, to keep our records updated and ensure we settle any accounts payable)</p>

11.6 Visitors to our Website

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud)</p> <p>Necessary to comply with a legal obligation</p>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> • Identity • Contact • Technical • Profile • Usage • Marketing and Communications 	Necessary for our legitimate interests (to study how people use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage 	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

12. 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 our Data Protection Representative.

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.

13. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the following third parties set out below:

- Professional advisers including lawyers, bankers, accountants and insurers;
- HM Revenue & Customs and Regulatory Authorities including the Solicitors Regulation Authority, the Law Society and the Legal Ombudsman;
- Auditors including auditors acting in connection with the Law Society's Conveyancing Quality Scheme;
- Law enforcement officials including the National Crime Agency;
- The Trustee in Bankruptcy;
- Mortgage Lenders (where we act for both client and mortgage lender);
- Service providers who provide IT and system administration services;
- Third parties connected to the legal service being provided including the court, counsel, opposing solicitors or counsel, the Local Authority, CAFCASS, the Police and Expert witnesses; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business to. 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.

Any personal data collected from our website may be disclosed to third-party service providers, such as providers of IT system management or Information security.

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.

14. INTERNATIONAL TRANSFERS

Whenever we transfer any personal data out of the European Economic Area (EEA) we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact our Data Protection Representative if you want further information on the specific mechanism used by us when transferring personal data out of the EEA.

15. YOUR LEGAL RIGHTS

Under certain circumstances, you have the following rights under the GDPR in relation to your personal data:

- **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.

15.1 No Fee Usually Required:

If you wish to exercise any of the rights set out above, please contact our Data Protection Representative.

You will not have to pay a fee to access an electronic version of your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee for a paper copy of the personal data.

We may also 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.

15.2 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.

15.3 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.

16. 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. We request that they only process your personal data on our instructions and are compliant with the GDPR.

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.

17. DATA RETENTION

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data can be requested by contacting our Data Protection Representative.

18. OUR WEBSITE

18.1 Cookies

We may use cookies on certain areas of our Website.

You can choose to disable the cookies from your browser and delete all the cookies currently stored on your computer. On Microsoft Internet Explorer, this can be done by selecting “Tools/Internet Options” and reviewing your privacy settings or selecting “delete cookies”. This may however prevent you from taking full advantage of the Website.

18.2 Links

Our website may contain links that make it easy for users to visit other websites. If you use the links to leave the website and visit a website operated by a third party, we do not have any control over that website. Accordingly, we cannot be responsible for the protection and privacy of any information which you have provided while visiting such websites. You should exercise caution and look at the privacy statement applicable to the website in question.

18.3 Children

Our Website is not intended for children and we do not knowingly collect data relating to children via our website.

19. SOCIAL NETWORKING

If you follow us on Social Networking sites such as Facebook, Instagram and Twitter you may give us any personal data which is included on your profile or you may provide us with further personal data if you message us via the social networking site. We will respond to any messages you send to us via social networking sites but we will not transfer any social media derived personal data to any other location or use it to contact you for marketing purposes.

You can unfollow us on Social Networking sites at any time.

20. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

20.1 Our Mailing List

You will receive marketing communications from us if you are an existing or historical client of Progression and you have not previously opted out of receiving marketing communications from us.

We may use your Identity and Contact 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 news, services or offers may be relevant for you.

20.2 Third Party Marketing

We will not share your personal data with any company outside of Progression for marketing purposes.

20.3 Opting Out

You can ask us to stop sending you marketing messages at any time by contacting our Data Protection Representative or by following the opt-out links on any marketing message sent to you.

21. COMPLAINTS

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 our Data Protection Representative in the first instance.