

# PRIVACY POLICY

## **Emin Read Solicitors Ltd**

In this Privacy Policy the terms, “we” or “us” is Emin Read Solicitors Ltd.

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. We are registered with the UK Information Commissioner’s Office (ICO) as a data controller under registration number: Z3545282.

## **Controller**

Emin Read Solicitors Ltd is the Controller and responsible for your personal data.

Emin Read Solicitors Ltd have an appointed Data Protection Officer (DPO):

Sacha Moore (Director)

Email: [sacha@eminread.co.uk](mailto:sacha@eminread.co.uk)

***Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.***

## **The information we collect**

We process personal information which you give us:

- As a client to provide you with legal services
- Whilst servicing your account through our website, in writing or over the phone
- If you request information or assistance from us

## **The personal information we process**

This will include:

- Personal details such as your date of birth, address, National Insurance Number, telephone number and email address
- Identity information such as your Passport, driving licence, utility bills or national identity card
- Credit history and records relating to you, your partner or anyone else you are financially linked with (we obtain this information from credit reference and fraud prevent agencies)
- Family, lifestyle, financial and social circumstances
- Financial details such as your income and information about your bank accounts
- Employment/self-employment details

## **Special categories of personal data**

Special categories of personal data include information about an individual’s health and other categories of personal information which are closely protected.

We do not generally process such information unless you have voluntarily provided this to us, or it is relevant to the legal service you have asked us to provide you with. For example, in Family and Matrimonial matters, or where you have advised us of an issue, such as your health, which could mean that you may be classed as a “vulnerable client” ie. due to your personal circumstances or personal characteristics you are particularly vulnerable to financial detriment. We will process sensitive information where you have provided this information

to us and have agreed that we can use this information to deliver products and services to you. Where possible we shall seek to minimise the collection and use of such special categories of personal data.

### How we use your information

We use your information to:

- Provide legal services to you
- Provide and service your relationship with us
- Comply with legal obligations for the prevention of financial crime and money laundering

We will process your information in order to meet our contractual obligations to you, where we have a legitimate interest to do so, where we are permitted by law or to comply with applicable laws and regulation.

PURPOSE	LEGAL BASIS
<b>Providing a service &amp; internal processing</b>	
To assess your needs and provide you with suitable products and services	<ul style="list-style-type: none"> <li>• Contractual obligation to provide you with, or a proposal including a costs estimate</li> <li>• Where special categories of personal data are processed, these are necessary to assess your needs</li> </ul>
To service and administer your matter including billing	<ul style="list-style-type: none"> <li>• Legitimate interests to provide and manage the service</li> </ul>
To verify the identity of our clients	<ul style="list-style-type: none"> <li>• To comply with legal obligations to prevent money laundering</li> </ul>
To confirm, update and improve our client records	<ul style="list-style-type: none"> <li>• To comply with legal obligations in the Data Protection Legislation</li> </ul>
To provide you with any information on the services that you have requested	<ul style="list-style-type: none"> <li>• To meet our contractual obligation to provide information on the services you have requested</li> </ul>
<b>Relationship Management</b>	
To manage and develop our relationship with you	<ul style="list-style-type: none"> <li>• Legitimate interest to service your matter and improve our service to you</li> </ul>
To inform you of products and services that may be of interest to you, where you have chosen to be made aware of this	<ul style="list-style-type: none"> <li>• With your consent</li> </ul>
<b>Training and Development</b>	
For training purposes and to improve our service to you	<ul style="list-style-type: none"> <li>• To comply with legal obligations for prevention of financial crime and money laundering</li> </ul>
<b>Complying with legal obligations</b>	

To prevent, investigate and prosecute crime, fraud and money laundering	<ul style="list-style-type: none"> <li>To comply with legal obligations for prevention of financial crime and money laundering</li> </ul>
For auditing purpose	<ul style="list-style-type: none"> <li>To comply with our legitimate interest to conduct audits</li> </ul>
If we are obliged to disclose information by reason of any law, regulation or court order	<ul style="list-style-type: none"> <li>To comply with legal obligations</li> </ul>
<b>Other</b>	
To transfer information to any entity which may acquire rights in us	<ul style="list-style-type: none"> <li>Legitimate interest for commercial interests</li> </ul>
For any other purpose to which you agree	<ul style="list-style-type: none"> <li>With your consent</li> </ul>

### How we retain your personal information

We will retain your personal information in accordance with applicable laws. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set out above.

Our retention periods are:

<b>Type of personal information</b>	<b>Retention period</b>
General personal data, which includes your normal personal data, personal identity and personal financial data	<ul style="list-style-type: none"> <li>6 years after the end of our business relationship with you, or the end of your matter, whichever comes later</li> </ul>
Client Due Diligence Material, which includes; copies of your Passport, Drivers Licence, Bank Statements and any associated documents and explanations you have given to us to prevent fraud, financial crime and money laundering	<ul style="list-style-type: none"> <li>6 years after the end of our business relationship with you, or the end of your matter, whichever comes later</li> </ul>
Special categories of personal data	<ul style="list-style-type: none"> <li>6 years after the end of our relationship with you</li> </ul>

### How we share your information

Where necessary or required, we share information with:

- Regulatory authorities to comply with our legal obligations
- Credit reference agencies to check your identity in accordance with our legal obligations
- Property Search Companies to identify any issues that might influence your decision to buy or sell a property
- Insurers for the purpose of providing you with appropriate financial cover for an identified insurable risk, or in connection with any claim made by you against this firm
- Property agents, Brokers, Lenders, other Solicitors involved in your transaction representing other party(ies) in your matter, to enable them and us, to fulfil our obligations to you
- Other Government Departments such as HMRC, Companies House, Probate Registry, Court of Protection or HM Land Registry to fulfil your and our legal obligations
- Experts and Barristers required to work on your matter
- Our Auditors and external assessment bodies to achieve and maintain any Regulatory or Quality Assurance Standards and accreditations which meet our legal obligations and enable us to provide quality legal services to you

## **Information Security**

We invest appropriate resources to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. However, no interest-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

## **Updates**

We will keep this Privacy Policy under review and make updates from time to time. Any minor changes to this Privacy Statement will be posted on this page and we will communicate any major changes to you.

## **Cookies**

Our website uses cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our website).

## **Your Rights**

You have the right to request copies of your personal information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased. You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop processing your personal information and/or to withdraw your agreement to processing based on "consent", but this does not apply where we have other legal justification to continue processing your data or an overriding legitimate interest.

In relation to all these rights, please write to us using the address below.

## **Complaints Process**

If you are dissatisfied with how we have handled your personal information, we will investigate your complaint.

In the first instance, please make your concerns known to the Fee Earner dealing with your matter. You may do so by writing to them via email or letter, calling the office that the fee earner is based in and arranging to meet with them at their office. We would hope that your concerns are dealt with satisfactorily at this stage however, if you feel this course of action did not allay your concerns, then you have the following options;

You may arrange to speak with our Office Manager, James Flawn via telephone. Should escalation be required, please email your complaint issues to Sacha Moore – Partner and Data Protection Officer at [sacha@eminread.co.uk](mailto:sacha@eminread.co.uk) alternatively, please write to Emin Read Solicitors Ltd, 35 Gildredge Road, Eastbourne, East Sussex, BN21 4RY.

Your complaint will be acknowledged within 30 days from the day after we have received it, however if this day falls on a weekend, we will respond by the next working day. We shall investigate the complaint without undue delay. We would aim to provide you with a substantive response to your complaint within 3 weeks from the date of acknowledgement.

Should you remain dissatisfied following our substantive response, you have the right to complain to the Information Commissioner's office – [www.ico.org.uk](http://www.ico.org.uk) (The UK supervisory authority for data protection issues).

For further details regarding how to make a complaint unrelated to how we handle your personal data, please consult our Complaints Procedure on our website.

**Contact us**

You can contact us by writing to:

Sacha Moore, Emin Read Solicitors Ltd, 35 Gildredge Road, Eastbourne, East Sussex, BN21 4RY.

By email: [enquiries@eminread.co.uk](mailto:enquiries@eminread.co.uk)

Telephone: 01323 819519

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