



## CLIENT CONTACTS

We process personal data about individuals who instruct us on behalf of organisations, individuals who work for such organisations, contractors and advisors of such organisations, and directors and shareholders of such organisations. We also process personal data about individuals who instruct us on their own behalf, but this is not the majority of our practice. This section includes information about both current and past clients.

### What do we collect?

We may collect the following kinds of information about you where relevant.

Types of data	Sources
<b>Identity Data</b> First name, last name, title, date of birth, gender, company name (if applicable), your username and password (if you use HFW Extra, the HFW Claims Portal or other HFW IT services), and in some cases photographic and residential identification documents.	The organisation for which you work. Directly from you. Other professional advisors. Other parties involved in a client matter.
<b>Contact Information</b> Home and work addresses as appropriate, telephone and fax numbers, email addresses and any other appropriate contact details in the circumstances in question.	The organisation for which you work. Directly from you. Other professional advisors. Other parties involved in a client matter. Public sources, such as information available from searching the internet or on business networking sites.
<b>Employment Information</b> Organisation name, position/title, employment history, professional specialism and qualifications.	The organisation for which you work. Directly from you. Other professional advisors. Other parties involved in a client matter. Public sources, such as information available from searching the internet or on business networking sites.
<b>Service Data</b> Details about services and products you have requested or we have provided to you or your organisation.	Directly from you. The organisation for which you work.
<b>Marketing and Communications Data</b> Preferences on receiving marketing from us and communication preferences.	Directly from you.

<b>Interests and Engagement with the firm</b> Professional and personal interests, requests made in the past, interaction and engagement with the firm eg. attendance at events.	Directly from you. The organisation for which you work. Public sources, such as information available from searching the internet or on business networking sites. Other parties involved in a client matter.
<b>Financial Data</b> In some limited circumstances where an individual's financial information is used or where the company's details can be said to be 'personal data', bank details and transaction history.	Directly from you. The organisation for which you work. Our bank.
<b>Other Information</b> Information we receive during the course of the provision of legal services to you or the organisation for which you work (this could be case matter-related or incidental to our business relationship with you), or the provision of value added services (such as special requirements for access, or dietary requirements, for our events). This may include 'special category' data, such as information about health, ethnic or racial origin or trade union membership, political opinions, religious or philosophical beliefs, and in more unusual cases (for example where included in an email in a disclosure exercise) sex life or sexual orientation. We are unlikely to receive biometric or genetic data. We may receive information about individuals' criminal records data if relevant to the interaction with the individual or the client matter.	The organisation for which you work. Directly from you. Other professional advisors. Other parties involved in a client matter. Public sources, such as information available from searching the internet or on business networking sites. Private investigators.

### How do we use your personal data and on what lawful bases?

We do not process 'special category' or criminal records data as a matter of course, but where we may receive such data we have included our lawful grounds for processing it.

Purpose	Type of data	Lawful basis for processing	Who we share it with
To open a new client file or matter file, including conducting the checks required by applicable laws and regulators, or to refresh such checks.	(a) Identity. (b) Contact. (c) Employment. (d) Financial. (e) Service. (f) Other.	(a) Compliance with our legal obligations. (b) Necessary for our legitimate interests to provide legal advice or to conduct legal cases on behalf of our clients. <b>Special category data/criminal records data:</b> (a) Necessary for the	The organisation for which you work. Where required as part of the conduct of the matter, or instructed by you, third parties and/or their professional advisors. UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the

		<p>purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.</p> <p>(b) Suspicion of terrorist financing or money laundering.</p>	National Crime Agency or the Solicitors Regulation Authority).
Communicating with you on client matters in order to fulfil our instructions, otherwise provide legal advice, or to discuss our services or fees.	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Service.</p> <p>(d) Interests and Engagement.</p> <p>(e) Other.</p>	<p>Necessary for our legitimate interests:</p> <p>(a) to provide legal advice or to conduct legal cases on behalf of our clients;</p> <p>(b) to develop business relationships in order for HFW to conduct a business which provides legal services.</p> <p><b>Special category data/criminal records data:</b></p> <p>(a) Necessary for the purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.</p>	The organisation for which you work.
The provision of legal services, such as the conduct of litigation, transaction services, or legal advice.	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Service Data.</p> <p>(d) Financial Data.</p> <p>(e) Other.</p>	<p>Necessary for our legitimate interests to provide legal advice to our clients and to handle cases on behalf of our clients or on our own behalf.</p> <p><b>Special category data/criminal records data:</b></p> <p>(a) Necessary for the purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.</p>	<p>The organisation for which you work.</p> <p>Service providers engaged on behalf of your organisation.</p> <p>Where required as part of the conduct of the matter, or instructed by you, third parties and/or their professional advisors.</p> <p>Government bodies (such as HMRC), Regulators, Courts, tribunals, local authorities, the Land Registry, where required as part of the conduct of the matter.</p> <p>UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the Solicitors Regulation Authority or the National Crime Agency).</p>

To respond to any complaints or claims and to carry out customer satisfaction research.	(a) Contact. (b) Interests and Engagement. (c) Other.	Necessary for our legitimate interests:  (a) to improve our services; (b) to develop business relationships in order for HFW to conduct a business which provides legal services.	The organisation for which you work.  UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the Solicitors Regulation Authority or the National Crime Agency).
To develop our business profile and analyse our business trends and profiles.	(a) Contact. (b) Service Data. (c) Other.	Necessary for our legitimate interest to develop our business which provides legal services.	Compilers of legal directories (where you have agreed to be a referee).
To provide you with value added services such as legal updates and relevant events.	(a) Identity. (b) Contact. (c) Interests and Engagement. (d) Marketing and Communications. (e) Other.	Necessary for our legitimate interest to develop business relationships in order for HFW to conduct a business which provides legal services.  Necessary for our legitimate interest to provide value added services to clients and business contacts.  Where we use emails for such communications and you are an individual for the purposes of the ePrivacy rules, we first obtain your consent.  <b>Special category data/criminal records data:</b>  Your explicit consent.	The organisation for which you work.  Events service providers (for example catering and security staff, and premises providers if the event is off-site).  Events partners (usually other law firms or professional service providers).
To make suggestions and recommendations to you about services (or goods) that may be of interest to you.	(a) Identity. (b) Contact. (c) Interests and Engagement. (d) Marketing and Communications. (e) Service. (f) Other.	Necessary for our legitimate interest to develop the business of HFW and provide value added services to clients and business contacts.  Where we use emails for such communications and you are an individual for the purposes of the ePrivacy rules, we obtain your consent.	The organisation for which you work.
To update our records and for audit purposes.	(a) Identity. (b) Contact. (c) Employment. (d) Marketing and	Necessary for our legitimate interests to conduct a business which provides legal advice to our clients and to handle cases on behalf of our clients or on our	The organisation for which you work.  Our professional advisors.  Government bodies (such as HMRC), Regulators, Courts,

	<p>Communications.</p> <p>(e) Interests and Engagement.</p> <p>(f) Financial.</p> <p>(g) Service.</p> <p>(h) Other.</p>	<p>own behalf.</p> <p><b>Special category data/criminal records data:</b></p> <p>(a) Necessary for the purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.</p>	<p>tribunals, local authorities, the Land Registry, where required as part of the conduct of the matter.</p> <p>UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example to the Solicitors Regulation Authority, or to the National Crime Agency).</p>
To ensure that we receive payment.	<p>(a) Contact.</p> <p>(b) Financial.</p>	Necessary for our legitimate interests to conduct a business which provides legal advice to our clients and to handle cases on behalf of our clients or on our own behalf.	Our service providers such as credit check agencies, counsel, local lawyers and debt collectors.
To comply with our legal and professional obligations, for example towards the Court, to comply with legislation on money laundering or terrorist financing, or to comply with privacy laws.	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Employment.</p> <p>(d) Marketing and Communications.</p> <p>(e) Financial.</p> <p>(f) Service.</p> <p>(g) Other.</p>	<p>Necessary to comply with our legal obligations.</p> <p><b>Special category data/criminal records data:</b></p> <p>(a) Necessary for the purpose of or in connection with legal proceedings, legal advice, or establishing/exercising or defending legal rights.</p> <p>(b) Preventing or detecting unlawful acts.</p>	<p>The organisation for which you work.</p> <p>Our professional advisors.</p> <p>Government bodies (such as HMRC), Regulators, Courts, tribunals, local authorities, the Land Registry, where required as part of the conduct of the matter.</p> <p>UK regulatory and law enforcement bodies, where required of us under UK law or regulation (for example the Solicitor's Regulation Authority, or to the National Crime Agency).</p>
To enable third party service providers such as counsel or expert witnesses to carry out any of the purposes set out above on our behalf.	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Employment.</p> <p>(d) Marketing and Communications.</p> <p>(e) Interests and Engagement.</p> <p>(f) Financial.</p> <p>(g) Service.</p> <p>(h) Other.</p>	As above.	Service providers engaged on behalf of your organisation or on behalf of us.
To enable us to operate effective office facilities, including ensuring	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Employment.</p>	Necessary for our legitimate interests to conduct a legal business by ensuring that our offices have effective	Service providers employed in connection with office facilities, including security providers and postal service providers.

adequate security measures are in place.	(d) Other.	administrative and security facilities in place.	
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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Usage, Profile, Marketing and Communications and Service 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 services, products (if applicable), and communications may be relevant to you.

You may receive marketing communications from us (usually legal update bulletins or event invitations) if you have requested information from us, previously instructed us, expressed an interest in a particular topic, or if you know one or more of our partners or staff and, in each case, if you have not opted out of receiving that marketing.

### Third-party marketing: joint events

From time to time we run events with third parties. The event invitations will always make it clear who these partners are before you accept or reject an invitation.

We may share your name, job title and the organisation for which you work with such event partners in order to coordinate the guest list and facilitate event administration.

## Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at [privacy@hfw.com](mailto:privacy@hfw.com) or by using the 'unsubscribe' links in the emails which we send you. Where you opt out of receiving these marketing messages, this will not affect our communications with you in the course of providing our services.