**Privacy Policy**

**The Carpet Place**

**1. Background**

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products and services and to all instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of The Carpet Place

**Changes to this privacy notice**

We may change this privacy notice from time to time by updating our website in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website www.thecarpetplacewigan.co.uk

**2. Personal data – what is it and what will we do with it?**

Personal data is information which directly or indirectly identifies you. We will only process your data in accordance with the Data Protection Act 2018 (DPA), the General Data Protection Regulation (GDPR) and other related legislative and regulatory provisions.

**3. What kinds of personal information about you do we process?**

We may collect certain personal data which will aid us in delivering the services set out in our contract with you. This includes personal identity details, financial information, information given during meetings, telephone calls correspondence or other interactions with you, and sensitive personal information.

In running and maintaining our website we may collect and process the following data about you:

* Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.
* Information provided voluntarily by you. For example, when you register for information.
* Information that you provide when you communicate with us by any means.

**4. How we collect your data**

Most of the data we collect will come directly from you but we may also collect data from third parties including family members or intermediaries (for example mortgage brokers, estate agents, financial institutions) who we work with to provide products or services to you or to provide you with quotations for services to be supplied to you.

We may gather information about your use of our website by using the cookies. A cookie is a small file placed on your computer’s hard drive. It enables our website to identify your computer as you view different pages on our website. Where used, these cookies are downloaded to your computer and stored on the computer’s hard drive. Such information will not identify you personally. It is statistical data only and does not identify any personal details whatsoever.

You can adjust the settings on your computer to decline any cookies if you wish. This can easily be done by activating the reject cookies setting on your computer.

**5. What do we use your personal data for?**

The use of your data could include, but is not limited to, verifying your identity, providing you with services and managing our contractual relationship with you. We may also use it to help improve and keep you up to date with services we can provide to you, or to inform you of any changes in the law that relate to you or to changes to our website, services or goods and products.

**6. What are the legal grounds for our processing of your personal information (including when we share it with others)?**

The legal bases for processing upon which we primarily rely are contractual, consent, legal obligation and legitimate interests.

At least one of these will always apply in respect of any of your data we process.

We use the information you provide primarily for the provision of legal services to you and for related purposes including:

* updating and enhancing client records;
* analysis to help us manage our practice;
* statutory returns;
* keeping you advised concerning issues that may be relevant to you – both during the contract/retainer and after it has come to an end;
* legal and regulatory compliance.

The normal justification for us processing your data will be to enable us to perform our contract with you. Our use of that information is subject to your instructions, the law and the duty of confidentiality we owe to clients. Depending on the specifics of your case, we may need to process information of a particularly sensitive nature. We will only do this in order to progress a claim on your behalf, as permitted under Article 9(2)(f) of the GDPR.

**7. Who do we share your information with?**

We will not disclose your personal information to any party other than in accordance with this Privacy Policy.

The work that we do for you may require us to pass certain information to other parties. Please be assured that we will only pass such information as is necessary to enable them to deal with your matter and only where this is either in your best interests or we are compelled to do so by law or a court order. This is justified by the performance of our contract with you and may also be justified by our need to comply with a legal obligation place on us.

Additionally, the work which we do for you may require that we pass information to various third parties such as barristers, expert witnesses and other professional advisers instructed by us on your behalf. Note that we will normally try and discuss this with you if and when it arises before sharing any information.

In certain circumstances we will be required to disclose privileged and/or confidential information to our regulatory the Solicitors Regulation Authority ("SRA"), our own advisers, auditors and the Legal Ombudsman (for the purposes of dealing with any complaint that may arise in connection with your matter) and our insurers (for the purpose of enabling us to make full notification to our insurers of circumstances arising from work we undertake for you which may result in an insurance claim). All of these are obliged to keep all such information confidential. Sharing of data in these circumstances will be justified by legal obligations imposed on us and/or our own legitimate interests.

In the event that it becomes necessary to prepare a detailed bill of costs for consideration by an opponent in litigation matters or for assessment by the court then we may instruct a specialist costs draftsman to carry this out on our behalf. The sharing of data for this purpose is, we consider, justified by the performance of our contract with you and may, in some circumstances be justified by our own legitimate interests.

In the event that we are required by law to disclose documents or give information relating to your affairs pursuant to a court order or notice or demand served by any person with authority to compel such disclosure, we shall comply. Sharing data in these circumstances is justified by the legal obligation imposed on us. We may disclose relevant information to any person or company authorised by us to undertake debt collection activity against you. This is justified by our legitimate interests.

In the event that the work that we carry out for has come from a referral to us by an introducer, we will not provide them with any information without your consent.

**8. How and when can you withdraw your consent?**

Where we have relied upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below. If, however, we are processing data on other bases, for example under a legal obligation, your consent cannot be withdrawn.

**9. Is your personal information transferred outside the UK or the EEA?**

We are based in the United Kingdom but your personal information may be transferred outside the European Economic Area. If we do so we will make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

**10. What should you do if your personal information changes?**

You should tell us so that we can update our records using the details in the Contact Us section of our website. We will then update your records if we can.

**11. Do you have to provide your personal information to us?**

We are unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we will make this clear.

**12. Do we do any monitoring involving processing of your personal information?**

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we will do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

**13. For how long is your personal information retained by us?**

Unless we explain otherwise to you, we will hold your personal information based on the following criteria:

* Under our terms of business we will keep your file and any information within it for as long as we have reasonable business needs, such as managing our relationship with you and managing our operations throughout the period of time that we do work for you and afterwards for a period of six years as we are required to do by law and to protect you in the event that you need access to the information.
* Files where we act for children are more complicated and should be retained for a period of 6 years after the youngest child attains 18 years in the event that they ever want to access their file.
* Staff files and information are retained for 6 years from the cessation of employment. Information regarding prospective employees is held for 12 months from the date of receipt with their express agreement that they are happy for us to do so. If such agreement is not received information is destroyed.

**14. What are your rights under data protection laws?**

Under the GDPR and DPA you have certain rights in respect of your data. More information about those rights, many of which are quite complex, can be found on the ICO website (https://ico.org.uk/). If you are unsure as to what your rights are in relation to any of the following issues, you should seek independent legal advice.

The GDPR provides the following rights for individuals:

* **The right to be informed** – i.e. the right to information about the collection and use of your personal data including the purposes for processing your data, the retention periods for that personal data, and who it will be shared with (see the information set out above under “Lawful bases for processing”);
* **The right of access** – i.e. a right to request and receive details of the data that is held about you including the purposes of your processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data is disclosed; the retention period for storing the personal data or, where this is not possible, the criteria for determining how long it will be stored; the existence of a right to request rectification, erasure or restriction or to object to such processing; the right to lodge a complaint with the ICO or another supervisory authority; information about the source of the data, where it was not obtained directly from the individual; the existence of automated decision-making (including profiling); and the safeguards provided if personal data is transferred to a third country or international organisation. In most circumstances no charge is made for such a request and we are under a duty to comply with the request within pre-defined time limits.
* **The right to rectification** – i.e. the right for you to request that incorrect data held is corrected.
* **The right to erasure** – i.e. the right in some circumstances for you to request that data about you be destroyed.
* **The right to restrict processing** – i.e. the right in some circumstances for you to request that the processing of your data is restricted or halted.
* **The right to data portability** – i.e. the right in some circumstances for you to obtain and reuse your personal data for your own purposes across different services.
* **The right to object** – i.e. the right in certain circumstances for you to object to the processing of your personal data.
* Rights in relation to **automated decision making** and profiling

**15. Inaccurate information**

If you think any of the information that we hold about you is incorrect or incomplete or has been changed since you first told us, then you should let us know in writing as soon as possible so that we can update our records.

**16. Complaints about the use of your personal data**

Should you have concerns about the use of your data then you should contact The Carpet Place in the first instance. If your concerns remain then the applicable supervisory body is the ICO. Please see https://ico.org.uk/for-the-public/raising-concerns/ for more information or contact them on 0303 123 1113.

**17. Your right to object**

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the Contact Us section of our website to exercise these rights.

**18. Contact Us**

If you have any questions about this privacy notice, or if you wish to exercise your rights, you can contact us by going to the Contact section of our website.

Alternatively, you can write to The Carpet Place, 732/734 Ormskirk Road, Pemberton, Wigan WN5 8BB