**Colina Greenway Employment Law Data Privacy Notice**

This privacy notice applies to all parties who have or are seeking a business relationship with the legal practice of Colina Greenway Limited (registered in England, company number 7586807) trading as Colina Greenway Employment Law (“we”/”us”).

We comply fully with the requirements of the Data Protection Act 2018, General Data Protection Regulation as incorporated into UK law and associated UK legislation (“UK GDPR).

For the purposes of this notice:

“business relationship” means either a client relationship for the purposes of receiving legal advice from us or a supplier relationship, under which we contract to receive supplies of goods or services.

“data controller” means the legal person that decides what personal data is collected and how it is processed.

“data processor” means a legal person that processes personal data on the instructions of a data controller.

“you” means the party with whom we have, are seeking to have, or have had a business relationship, including your authorised representative(s).

“personal data” means any data which relates to an identifiable natural person.

“processing” means any action done to personal data, including collection, recording, organisation, use, storing and deletion.

**The basis on which we process personal data**

The majority of data processing performed by us is done in the capacity of data processor. This relates to all the information that you provide to us for the purposes of us giving you advice. Where we act as a data processor we will process personal data in accordance with the instructions that you give us.

For a limited set of activities we process personal data as a data controller. This includes processing for the purposes of forming a contractual relationship with you; for invoicing and receiving payment from you or if you are a supplier, to arrange payment to you; and to comply with our legal and regulatory obligations, including but not limited to maintaining appropriate financial records and compliance with the requirements of our professional regulator, the Solicitors Regulation Authority.

Our lawful basis processing of personal data is to fulfil our contractual obligations to you and also to meet our own legal obligations. We may also rely on our legitimate interests, for example in conducting analysis of our business; or your legitimate interests, for example if there is a matter outside of your current instructions that we believe it is in your interests to make you aware of.

**The personal data that we process**

We may process any or all of the following personal data: name, address, contact details, nationality, date of birth, information about employment history, special category data (as defined below) and data about criminal records.

Special category data and criminal record data will only be collected where it is relevant to the provision of advice by us to you. Special category data comprises information regarding an individual’s racial or ethnic origins, political opinion, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of unique identification of a natural person, health data or data concerning a person’s sex life of sexual orientation.

Most of the personal data that we collect will be supplied by you. Where you supply us with personal data relating to a third party then it is your responsibility to ensure that you have a lawful basis for sharing the personal data with us to be processed in accordance with your instructions.

We may collect a limited amount of personal data from public sources such as LinkedIn, Companies House, credit reference agencies and your company website. We process this data to help us to perform our contractual obligations to you and for our own legitimate interests, for example in deciding whether to enter a business relationship with you.

**How personal data is processed**

Depending on the nature of our relationship with you we will process personal data to provide you with legal advice and deal with your enquiries, to contact you or any relevant person within your organisation by post, email and telephone. We will also process personal data to administer and manage our business, to defend ourselves in any claims made against us and to comply with our legal and regulatory obligations. We do not use any automated decision making processes.

**Sharing your data with third parties**

We only share your data with third parties where you have given your consent or instructions to do so or where we are otherwise permitted to do so by law.

Client information is protected by our obligations to maintain confidentiality and/or by legal privilege. We will share personal data with third parties where you expressly instruct us to do so or where we are under a legal obligation to do so. Third parties with whom we may share your data include barristers or lawyers operating in another jurisdiction and who are instructed by us on your behalf.

We use a third party data processor to host our IT systems, which are cloud-based. Our website and email are hosted by Clook and our practice management systems by Access UK Ltd. We use Thirdfort Limited to carry out identity and anti money laundering checks. Our third party suppliers are contractually bound to keep your personal data confidential and not to use it for any purpose other than one we authorise. Our third party suppliers maintain best practice standards to ensure data security and both meet ISO27001. All your personal data held by the practice is stored on servers within the UK.

We may also share personal data on a strictly need to know basis with other third party service providers such as our accountants; our regulator; our insurers and their advisers; and with third parties in connection with any proposed merger, acquisition or disposal of all or part of our business. We take steps to ensure that any data transferred to third party providers is used only for the purposes for which it is supplied and subject to appropriate security measures.

**How long we keep your data**

We keep your personal data for as long as is required to fulfil our contractual obligations to you or to meet our own legal obligations. In most instances this means that your data will be permanently deleted 6 years after your file has been closed or our business relationship has ended. Where we have an ongoing business relationship that has lasted more than 6 years we may retain certain data if we consider that it is in either your or our legitimate interests to do so, but we shall not be under any obligation to you to do so and we will have no liability to you if data that is more than 6 years old has been deleted.

**Transfers of data outside the European Economic Area (EEA)**

We will not ordinarily transfer personal data outside the UK or anywhere outside the EEA unless you have instructed us to do so either expressly or impliedly, for example where you are based outside the EEA and we send data to you in the course of our business relationship.

If in any other circumstances we transfer your personal data outside of the EEA to a country that does not have an EU data adequacy decision then we will ensure that appropriate measures such as model contractual clauses are in place to protect your data.

**Your data privacy rights**

You have the right to request access to any personal data that we hold about you. In certain circumstances you may also have the right to have your personal data rectified, erased or have its processing by us restricted, or to object to our processing your personal data at all.

If any of our processing is based on your explicit consent, for example direct marketing communications, you have the right to withdraw your consent at any time.

If you wish to exercise any of these rights then you can contact us at info@colinagreenway.com and putting “data privacy rights” in the subject line.

If you have any concern or complaint about the way that we are processing your personal data then we encourage you to raise it with us in the first place. If you are not satisfied with the response you receive or for any other reason feel that you involve a third party then you should contact the Information Commissioner’s Office. Full details about how to make a complaint to the Information Commissioner’s Office can be found at [www.ico.org.uk/make-a-complaint/](http://www.ico.org.uk/make-a-complaint/) .

**Updates to this notice**

From time to time we may update the contents of this notice. The current version of the notice will always be available on the website.

**Our contact details**

Our registered office and postal address is Sheraton House, Castle Park, Cambridge CB3 0AX.

If you would like to contact use with any questions, concerns or requests regarding matters covered by this data privacy notice then you should email us at info@colinagreenway.com, putting “data protection” in the

subject line.

Last updated: 8th December 2023