

to I address this statement to any person who is or might become a data subject of mine and to clients and any other person who is a data controller or data processor of a data subject of mine. A data subject of mine is any natural person (including an officer or employee of a legal or other entity), who contacts me by any means, as a result of which I hold personal data about him or her, clients, other persons with whom I am in contact in the course of my work and persons whose personal data is provided to me by clients and other persons.

definitions Definitions in the General Data Protection Regulations and any UK Data Protection Act for the time being in force apply to words used in this statement.

data controller, data processor I am, depending on the circumstances, the data controller, the data processor or both.

purposes of processing I process personal data to:

- provide services under contract;
- comply with regulatory and other legal obligations;
- market my services;
- send updates and law articles to you; and
- protect myself against potential claims.

lawfulness of processing I process personal data on the basis that the processing is necessary for the performance of a contractual obligation or a legitimate interest of mine. There might occasionally be circumstances in which I seek and obtain a data subject's consent or in which processing is necessary in the public interest.

personal data processed Personal data includes any data by which a natural person can be identified, and processing includes storage. I process personal data (mainly names and contact details) to identify clients and communicate with clients and others and other personal data necessary for my work.

data sources I obtain most personal data from my clients and those who have indicated that they have an interest in my services. I also obtain some personal data from others (see the first paragraph above) and from publicly available sources.

recipients Any data provided by a client is treated as confidential to that client and I will not disclose it to others unless it is necessary in order to provide the services contracted for by the client, to comply with regulatory and other legal obligations or to protect me against a claim or potential claim. I use Microsoft's MS365 services including word processing and email.

third countries I do not send data to third countries, unless lawfully required to do so by a client or to comply with regulatory and other legal obligations.

retention period I retain personal data for the maximum period in which proceedings can be started and longer if so required by my client or to comply regulatory and other legal obligations.

data subject's rights Where relevant, data subjects have the right to:

- access to, rectification of and erasure of data;
- withdraw consent (if given) to the processing of data; and
- complain to a supervisory authority (<https://ico.org.uk/>).

automated decision making None.

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