

Scullion LAW Client's Privacy Notice

What we need

Scullion LAW will be a "controller" of the personal information that you provide to us when you instruct us to act on your behalf. Scullion LAW collects personal data and then discloses such personal data to a third party such as Digby Brown, Complete Clarity, MacDonald Henderson, Davidson Chalmers, HM Connect.

When you become a client Scullion LAW, we will collect, store and use the personal information that you provide to us in your instructions and during the course of our solicitor / client relationship. We may ask you for additional personal information during the course of our client / solicitor relationship, which shall be collected, stored and used in accordance with this privacy notice.

We will also receive and process personal data of third parties for whom we neither act nor have any connection with. This can be supplied to us by another solicitor, belong to the defender or witness in a court case, the beneficiary in a Will or Executry case or the other party in an accident case. These are examples of where we might receive and process personal data which does not belong to our clients. This list is not exhaustive and we will receive and process personal data from a wide range of third parties.

Why we need your personal information – contractual purposes

We need to collect our clients' personal information so that we can provide legal services for you. We will use our clients' personal information to:

- provide you with legal advice, including by communicating with you by email, letter and/or telephone, etc.;
- represent you as your solicitors in connection with the matter in which we have been instructed;
- respond to and communicate with third parties regarding your questions, comments, support needs or complaints, concerns or allegations in relation to complaints, for example, we will use your personal information to investigate your complaint, take disciplinary action, etc.;

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to provide you with legal advice and / or represent you as your solicitors. As such, we may require to withdraw from acting.

Why we need your personal information – legitimate purposes

We also process our clients' personal information in pursuit of our legitimate interests to:

- promote our services by sending clients communications with information for upcoming events, upcoming campaigns, new services and legal updates;
- invite our clients as guests to our events.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on info@scullionlaw.com If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a client.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our clients for the purposes of complying with our obligations under:

- the Law Society of Scotland requirements for solicitors;
- AML requirements; and
- Council of Mortgage Lenders requirements.

If another solicitor or organisation acting for you has provided your personal data in the course of a transaction with us on behalf of a client for whom we act.

Our Lawful Basis for Processing your personal data is the Legitimate Interests of this firm and its clients to properly and lawfully represent our clients' interests. This Lawful Basis for Processing also applies to personal data of individuals who have no connection with our firm where our clients instruct us to carry out such processing. Examples of such individuals are beneficiaries named in a Will, the Defender who we

are instructed to sue, or a witness in a court action. This list is not exhaustive and there are many other instances where we will be required to process personal data as instructed by our clients.

Personal data processed by third parties on our behalf

Your personal data will be processed by third parties with whom we are required to deal with when acting properly and lawfully for you. Examples of such parties are professional searchers, our IT support company and our practice management system support desk, our external Cashroom service, our file store for closed files, our secure shredding company and our fax to email conversion service. This list is not exhaustive and will change from time to time. If you require specific details, please contact us.

We are regulated by The Law Society of Scotland and they have a right of access to our books and records to carry out regulatory inspections. They may remove personal data from our premises and systems in order to carry out regulatory checks.

Some of our email marketing activities are managed by Client Communications Ltd. You can view their Privacy Statement here:

<http://www.clientcommunications.co.uk/privacy-policy/>

Client Communications Ltd. uses The Rocket Science Group LLC, of the State of Georgia, USA, trading as MailChimp to process the data for our email marketing campaigns. MailChimp has certified its agreement to the EU-US Privacy Shield Framework. You can view its Privacy Policy here: <https://mailchimp.com/legal/privacy/>

They gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

Other of our marketing activities are managed by Sales Force Inc. and/or some of its subsidiaries or partner companies, such as Pardot or Creation Technology Solutions. You can view Sales Force Inc. Privacy Statement here:

<https://www.salesforce.com/company/privacy/#>

How long we keep your personal information

We keep our clients' personal data in keeping with the specific retention period requirements of the Law Society of Scotland. We will review and possibly delete your personal information following a period of at least 10 years after you have ceased to be our client.

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at info@scullionlaw.com

Your rights

You can exercise any of the following rights by writing to us at 105 Cadzow Street, Hamilton, ML3 6HG.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Our Complaints Procedure

Our complaints procedure in respect of any legal work we carry out on your behalf is stated in our Terms of Business letter to you. If you are not a client of the firm, you should write to us at 105 Cadzow Street, Hamilton, ML3 6HG.

If you are unsatisfied with the manner in which we have dealt with any complaint relating to your personal data, you are entitled to ask the Information Commissioner to investigate. You will find information on how to raise a concern with the information

Commissioner on their website by clicking this link: <https://ico.org.uk/concerns/> If you do not have Internet Access, you can call the Information Commissioner by telephoning 0303 123 1113.