
PRIVACY NOTICE

BACKGROUND:

Pieri Graham Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Pieri Graham Limited, Registered in Scotland, Company Number SC340456

98 West George Street, Glasgow G2 1PJ

Email address: info@perigrraham.com

Telephone number: 0141 332 2525

We are regulated by the Law Society of Scotland

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.

- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

5. What Personal Data Do You Collect?

We use a variety of personal information depending on the services we deliver. In all cases, we need to use your name, address, date of birth, contact details and information to allow us to check your identity.

Contact and socio-demographic characteristics	We will use this data and your date of birth to allow us to check your identity to meet our legal obligations. We may also use your date of birth to allow us to determine how long we will retain historic wills.
Race, ethnic origin, politics, religion, trade union membership, sex life, sexual orientation	These special categories of information may be required in matrimonial cases (for example, divorce) and other forms of dispute resolution and litigation.
Health and medical information	This information may be used in matrimonial cases, cases involving individuals who have a vulnerability (e.g. arranging powers of attorney), or other forms of dispute resolution.
Criminal offence data	This information may be processed in relation to matrimonial cases and other cases. It may also be used in all cases in relation to due diligence required for fraud prevention, and/or anti-money laundering to meet our legal obligations.
Information on financial status or position	Including salaries, pensions, dividends and other earnings, data used to make assessments of ability to meet existing or potential financial obligations, information from credit reference agencies, information about money an individual owes or could owe, information about an individual's assets. This information will be used in a range of legal matters including debt recovery, litigation/dispute resolution, matrimonial, employment, personal tax, trusts, wills, the winding up of estates, business creation/acquisition/disposal, property matters, lending, borrowing, other financing.
Information relating to payment, credit and debits.	Funds received from or for an individual or made in relation to a client's matter (e.g. to pay for the legal service, to pay for outlays incurred by us on your behalf, to pay in settlement of a claim, property purchase/sale, other asset purchase/sale).
Personal information in communications with individuals	Copies of letters received by or sent to us, information relating to emails received by or sent by us, file notes, other information about when communication has taken place and/or information you supply when contacting us through our website.

Social relationships	Personal information relating to an individual's family and social relationships including status of spouse/partnerships, wider family including parental and caring status may be used in range of types of cases.
Open data and public records	Personal information relating to individuals that is, or can be, collected from public or open sources.
Consents	Personal information relating to permissions, consents or preferences given to us by individuals, contact permission, mandates to contact employers, other solicitors, and/or GPs and other medical specialists.
National Identifiers	Unique identifiers attributed to an individual from a Government department. This information may be used as part of our customer due diligence measures for identifying individuals to meet our legal obligations. The information may also be used in different types of cases.

6. How do you gather personal information?

We obtain personal information from a variety of sources:

- Directly from you or your representative, for example when you submit details through our website, contact us in writing, by email, in person, by telephone, or by any other method.
- From information you or your representative have made publicly available.
- From other people you know, including family members, and people you are financially linked to, and their representatives. This also includes organisations and individuals who are our clients in circumstances where you are party to, or otherwise involved in, a matter on which we are instructed, for example as a witness, beneficiary, guarantor, buyer, seller, debtor, defender, pursuer, employee, or employer.
- From other organisations which have referred you to us, for example accountants, financial advisers, other solicitors, insurance companies, banks.
- From open data and public records, for example from various public registers to verify the identity of our clients and beneficial owners to assist us in complying with our legal obligations.

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

To respond and communicate

to allow us to respond to you and communicate with you. This may include responding to emails or calls from you.

Using client information

When you become our client, we will collect, store and use the personal information that you provide in your instructions and during the course of our solicitor/client relationship.

We need to collect personal information so that we can perform our obligations to you. We will use such personal information to:

- provide you with legal advice, including communicating with you by email, letter and/or telephone, etc. in connection with the services that we provide;
- represent you as your solicitors in connection with such services;
- provide you with legal advice in respect of the matter(s) upon which we are instructed to provide advice; and/or
- process and make payments in connection with such matter(s).

If you do not provide us with all of the personal information that we need to collect in order to perform our obligations, this may affect our ability to provide you with legal advice and/or represent you as your solicitors.

We may also process personal information for purposes relating to the provision of services we provide including updating, reviewing and enhancing client records and undertaking analysis for management purposes.

Business clients

For business clients (including bodies corporate and/or charities) we will use personal information about key individuals in the business, so that we can operate and administer the services which we provide.

- To comply with our legal obligations to prevent financial crime we will complete due diligence steps by using personal information about key individuals who are either a sole trader of the business or are a proprietor, director, company secretary, shareholder, partner, member, committee/board member, trustee, charity trustee, controller, beneficial owner or authorised signatory to the account of the business.

To comply with our legal obligations to prevent financial crime

To comply with our legal obligations to prevent financial crime including money laundering under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, we will use personal data including name, address, date of birth, country of residence/citizenship, personal identification (which may include passport number or driving licence number), information about any criminal convictions, information about roles held in public office, and information about your status as or your relationship and association with a politically exposed person.

We will give personal information to and receive personal information from third parties where that is necessary to meet our legal obligations, including fraud prevention agencies, the police and other law enforcement and government agencies, and regulators.

To comply with regulatory obligations

We will provide our regulator, the Law Society of Scotland, with names of individuals for whom our solicitors act under Powers of Attorney.

Other parties

We will process personal information of individuals who are not our client, but have a relationship with you. We will obtain such personal information from the sources described above, which will include the same categories of information described above.

We will use this information to comply with our duty as a legal adviser to you. We may have a duty to disclose

information to you where relevant to their case (for example information about earnings in a divorce matter).

Financial management and debt recovery

We may give personal information to and receive personal information from third parties where that is necessary to recover debts due by you to us, for example sheriff officer services.

Automated decision making and profiling

We do not use your personal data for automated decision-making or profiling.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

We will retain your personal information for as long as is required to comply with our obligations you ask us to return any copies of it to you or send it to a third party.

We have a data retention policy that sets out the periods and rules for retaining and reviewing all information that we hold. This sets out different retention periods, which depend upon the nature of the information, and you can request details by contacting us.

9. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

The security of your personal data is essential to us. We will take all reasonable precautions to keep your data secure, including safeguards against unauthorised access, use or data loss. Our staff receive data protection training. We have appropriate data protection and information security procedures in place. Your personal information is stored on our systems to which access is both physically and electronically controlled.

10. Do You Share My Personal Data?

We may need to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations imposed on us and on you in respect of the matter(s) upon which we are advising. Such organisations include the Law Society of Scotland, DWP, HMRC, Revenue Scotland, Scottish and UK courts, Registers of Scotland and / or local authorities.

We may share personal data with our or your other professional advisors for the purposes of taking advice and the event of any legal claims.

If we employ third party suppliers to provide services on our behalf, these suppliers may process personal data on our behalf as "processors" and are subject to written contractual conditions only to process that personal data under our instructions and to protect it.

We may need to share personal information with other organisations, which during the course of our providing services to you may be contracted to supply a service related to such matter. This may include property search companies, Companies House, expert accountants and / or auditors.

If we share personal information with external third parties, we will only share such personal data as is strictly required for the specific purpose. We will take reasonable steps to make sure that recipients shall only process such personal data in accordance with that purpose.

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Pieri Graham Limited for the attention of Data Protection Lead

Email address: info@pierigraham.com

Telephone number: 0141 332 2525

Postal Address: 98 West George Street, Glasgow G2 1PJ

13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. We will tell you about any changes by letter or on our website.