

Privacy Policy

In this Privacy Policy the terms, 'we' or 'us' is Axiom DWFM Limited trading as Axiom DWFM.

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number ZA199800.

Please read this Privacy Policy carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

What Information We Collect

We process personal information which you give us:

- As a client to provide you with legal services.
- Whilst servicing your account through our website, in writing or over the phone.
- If you request information or assistance from us.
- When engaging with us during marketing, social media and networking activities
- When interacting with us via our website

What personal information We Process

This includes:

- Personal details such as your date of birth, address, National Insurance Number, telephone number and email address.
- Identity information and documentation such as your passport, driving licence, utility bills or national identity card.
- Credit history and records relating to you, your partner or anyone else you are financially linked with (we obtain this information from credit reference and fraud prevent agencies or via third party organisations that will engage with you directly to gather your data).
- Family, lifestyle, financial, medical and social circumstances.
- Financial details such as your income and information about your bank accounts.
- Employment/self-employment details.
- Usage information such as how you use our website and services.
- Technical information such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- Other personal information required in connection with the legal services being provided.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose.

Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect

Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Special Categories of Personal Data

Special categories of personal data include information about an individual's health and other categories of personal information which are closely protected.

We do not generally process such information unless you have voluntarily provided this to us, or it is relevant to the legal service you have asked us to provide you with. For example, in Family & Matrimonial matters, or where you have advised us of an issue, such as your health, which could mean that you may be classed as a “vulnerable client” i.e. due to your personal circumstances or personal characteristics you are particularly vulnerable to financial detriment, or in personal injury matters. We will process sensitive information where you have provided this information to us and have agreed that we can use this information to deliver products and services to you. Where possible we shall seek to minimise the collection and use of such special categories of personal data.

How is your information collected

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us the personal information as stated above by filling in forms or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical and usage information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - (a) Technical and usage information from analytics providers such as Google based outside the UK;
 - (b) Personal and identity information from other professional services such as estate agents or financial brokers. From publicly available sources such as Companies House and the Land Registry.
 - (c) Personal information relating to anti-money laundering checks
 - (d) Personal information that is required in connection with the legal services being provided.

How we use your Information

We use your information to:

- Provide legal services to you.
- Provide and service your relationship with us.
- Comply with legal obligations for the prevention of financial crime and money laundering.
- Internal record keeping
- To improve our products and services

- Periodically send newsletters, promotional emails about new services and other information which you have provided.
- From time to time, to use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customize the website according to your interests.

We will process your information in order to meet our contractual obligations to you, where we have a legitimate interest to do so, where we are permitted by law or to comply with applicable laws and regulations.

PURPOSE	LEGAL BASIS
Providing a service and internal processing	
To assess your needs and provide you with suitable products and services	<ul style="list-style-type: none"> • Contractual obligation to provide you with, or a proposal including a costs estimate • Where special categories of personal data are processed, these are necessary to assess your needs
To service and administer your matter including billing	<ul style="list-style-type: none"> • Legitimate interests to provide and manage the service
To identify and verify the identity of our clients	<ul style="list-style-type: none"> • To comply with legal obligations to prevent money laundering and meet regulatory requirements.
To confirm, update and improve our client records	<ul style="list-style-type: none"> • To comply with legal obligations in the Data Protection legislation and Regulatory requirements set by our regulator, the Solicitors Regulation Authority.
To provide you with any information on the services that you have requested	<ul style="list-style-type: none"> • To meet our contractual obligation to provide information on the services you have requested
Relationship Management	
To manage and develop our relationship with you	<ul style="list-style-type: none"> • Legitimate interest to service your matter and improve our service to you
To inform you of products and services that may be of interest to you, where you have chosen to be made aware of this	<ul style="list-style-type: none"> • With your consent

Training and development

For training purposes and to improve our service to you

- Legitimate interests to improve our services and develop our team.

Complying with Legal Obligations

To prevent, investigate and prosecute crime, fraud and money laundering

- To comply with legal obligations for prevention of financial crime and money laundering
- To comply with the requirements of the Solicitors Regulation Authority.

For auditing purpose

- To comply with our legitimate interest to conduct audits and

If we are obliged to disclose information by reason of any law, regulation or court order

- To comply with legal obligations

Other

To transfer information to any entity which may acquire rights in us

- Legitimate interests for commercial interests

For any other purpose to which you agree.

- With your consent

How we retain your personal information

We will retain your personal information in accordance with applicable laws. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set out above.

Our retention periods are:

Type of Personal Information	Retention Period
General personal data which includes your normal personal data, personal identity and personal financial data	<ul style="list-style-type: none"> • Up to 15 years after the end of our business relationship with you, or the end of your matter which ever comes later, save in relation to Will matters.
Client Due Diligence Material which includes copies of your Passport, Drivers Licence, Bank Statements	<ul style="list-style-type: none"> • Up to 15 years after the end of our business relationship with you, or the end of your matter

and any associated documents and explanations you have given to us to prevent fraud, financial crime and money laundering	which ever comes later, save in relation to Will matters.
Special categories of personal data	• 6 years after the end of our relationship with you.
Call recordings	• 1 year
CCTV – digital images if you visit our offices	• 90 days

How we share your information

Where necessary or required we share information with:

- Regulatory authorities to comply with our legal obligations.
- Credit reference agencies to check your identity in accordance with our legal obligations.
- Third parties providing support to conduct due diligence for identity and verification purposes.
- Property Search Companies to identify any issues that might influence your decision to buy or sell a property.
- Insurers for the purpose of providing you with appropriate financial cover for an identified insurable risk, or in connection with any claim made by you against us.
- Property Agents, Brokers, Lenders, other Solicitors involved in your transaction representing other party(ies) in your matter to enable them and us to fulfil our obligations to you.
- Other Government Departments such as HMRC, Companies House, Probate Registry, Court of Protection or HM Land Registry to fulfil your and our legal obligations.
- Experts and Barristers required to work on your matter.
- Our Auditors and external assessment bodies to achieve and maintain any Regulatory or Quality Assurance Standards and accreditations which meet our legal obligations and enable us to provide quality legal services to you.
- Other legal firms in order to progress your matter, as agreed in our engagement documentation with you.

Transfer of your information outside the European Economic Area (EEA)

It may be necessary to transfer your personal information outside the EEA or to an international organisation in order to provide the legal services. A list of all third countries that your personal data may be transferred to can be provided by the firm's Data Protection Manager.

These countries do not have same data protection laws as the United Kingdom and EEA. The European Commission has not given a formal decision that these countries provide data protection that is substantially similar to those in the United Kingdom and EEA, however any transfer will be subject to safeguards as permitted under the General Data Protection Regulation. These safeguards are designed to protect your privacy rights and provide you with remedies in the unlikely event that your personal information is misused.

If you would like any further information please contact the Data Protection Manager.

Information Security

We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site or system can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

Updates

We may change this policy by updating this document. You should check the document from time to time to ensure you are happy with any changes.

Cookies

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

The only cookie currently in use on the firm's website is used to support analysis and understanding of how people use the website (what they like most, when is the busiest time of day on the site, have people found new content when it is published, visitor volumes to our website etc).

This analysis is to help improve the usage and effectiveness of the website. The data collection and reporting behind this analysis is currently provided by Google Analytics. Users continued use of this website will indicate agreement to the use of a google analytical cookie. More information on this cookie and advice on how to stop this cookie being used is set out below.

Cookie Opt Out

In order to provide website visitors with more choice on how data is collected by Google Analytics, Google has developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to stop data being sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not affect usage of the website in any other way. A link to further information on the Google Analytics Opt-out Browser Add-on is provided below for your convenience.

<http://tools.google.com/dlpage/gaoptout?hl=None>

For more information on the usage of cookies by Google Analytics please see the Google website. A link to the privacy advice for this product is provided below for your convenience.

<http://www.google.com/analytics/learn/privacy.html>

Disabling Cookies

If you would like to restrict the use of cookies you can control this in your Internet browser. Links to advice on how to do this for the most popular Internet browsers are provided below for convenience and will be

available for the Internet browser of your choice either online or via the software help (normally available via key F1).

- Internet Explorer

<http://windows.microsoft.com/en-GB/windows7/Block-enable-or-allow-cookies>

- Google Chrome

https://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647&p=cpn_cookies

- Mozilla Firefox

<http://support.mozilla.org/en-US/kb/Blocking%20cookies>

- Apple Safari

<http://docs.info.apple.com/article.html?artnum=32467>

Your Rights

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have



objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complaints Process

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint. You also have the right to complain to the Information Commissioner's Office - (www.ico.org.uk).

Contact Us

You can contact us by writing to us at:

Axiom DWFM Limited

101 Wigmore Street, London, W1U 1FA.

Data Protection Manager: Pragnesh Modhwadia (pm@axiomdwfm.com)

Telephone queries can be made to 020 8951 6989