PRIVACY POLICY

Thomas & Co is a law firm regulated by the Solicitors Regulation Authority under number 8007162.

Please read this Privacy Policy carefully to understand why data is being collected and what we do with that data once in our possession.

We may change the privacy policy or the terms of business from time to time by amending this page. Further information about data privacy may be found in our client care letter with you.

Thomas & Co's Data Protection Officer is currently Martin Thomas who can be contacted on 01747 871600 or at office@thomassolicitors.co.uk or at Thomas & Co, Caerglow House, The Square, Tisbury, Wiltshire SP3 6JP.

If you have any queries regarding the policy, please contact Martin Thomas.

Who is affected by this policy:

- clients and former clients;
- enquirers and prospective clients;
- job applicants and our current and former employees, contractors, work experience personnel and providers of outsourced services;
- people who make enquiries or requests under the Data Protection Act 2018;
- people who use our services, e.g. those who subscribe to our newsletter.

On what basis we can process your information:

Data Protection law (including the Data Use and Access Act 2025) states we are allowed to use personal information only if we have a proper reason for doing so. This includes sharing it outside Thomas & Co. The law states we must have one or more reasons for processing it:

- to fulfil a contract we have with you – it is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you. The retainer between you and Thomas & Co, which is made up of our terms of business and engagement letter, sets out the terms of the contract and the services we will provide, or
- when it is in our legitimate interest, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you). To determine this, we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the

processing of the data, the nature of the data, and the impact of the processing on you, or

- when it is our legal duty, it is necessary in order to comply with mandatory legal obligations to which we are subject, or when you consent to it.

Your right to be informed:

You have a right to be informed as a data subject of the data we hold and process about you. This policy document is intended to do that. If you have any questions or if you feel that this Policy does not deal with your concerns or questions, please contact our Data Protection Officer on the contact details provided.

Your right of access to personal information:

We try to be as open as we can about giving people access to their personal information. Individuals can find out if we hold any personal information by making a request under the Data Protection Act 2018. If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information.

To make a request to us for any personal information we may hold you need to put the request in writing addressing it to our Data Protection Officer (contact details below). If you agree, we may try to deal with your request informally, for example by providing you with the specific information you need over the telephone. We will still need to verify your identity if we do this. We will need to satisfy ourselves as to your identity. Please therefore send us proof of who you are so that we know we are sending the information to the right person. We accept the following as proof:

- a copy of your birth certificate;
- a copy of your passport;
- a copy of your driving licence.

Please do not send original documents.

You will also need to let us have a postal or email address so that we can send you the information. We ask that you mark the covering envelope or email as 'Confidential'.

Your right to rectification:

This is a right to ask us to correct any wrong data we hold about you. You can ask us to correct any mistakes by contacting the Data Protection Officer.

Your right to erasure:

This is a right to ask us to delete any data we hold about you. You can ask us to do this by contacting the Data Protection Officer. We will not be able to delete data in situations where there is a legal or regulatory need to retain it and we will explain this if it happens. We may also be unable to fully delete computer-held data because of system design restrictions and again we will explain this if it happens.

What information do we collect:

The type of information we may collect and process about you depends on the work we do for you if you are a client. We will need different data if you are one of our workers.

Typically, we need to know:

- your name
- who you are to us (such as a client, employee or a member of the public) and sometimes (for conflict and professional reasons) how/whether you are related to another client or person
- your e-mail address and contact numbers
- your gender (to enable us to address you correctly)
- next of kin, bank details and GP's address if you are a member of staff
- your current (and occasionally) previous home addresses
- documents to verify your ID and your bank details for both ID purposes and to make or receive payments
- CV, if you are a job candidate
- case-related information, such as information forms we ask you to fill in
- lifestyle and social circumstances data where relevant to the legal services we provide, for example in divorce, financial remedy or children matters. This may include information which is classified as special category personal data under data protection law, such as information about your health, racial or ethnic origin, political opinions, sex life or sexual orientation, religious or

philosophical beliefs or trade union membership, genetic or biometric data. Where we process special category personal data, we will only do so where a condition under data protection law permits us to do so. This may include where processing is necessary for the establishment, exercise or defence of legal claims. In some circumstances, we may rely on your explicit consent and, where this is the case, we will explain this to you and obtain your consent separately

We use your personal information to:

- verify your identity and establish the source of funding in any transaction
- carry out appropriate anti-fraud checks (by conducting online searches using a third-party identity provider). Please note that this will not affect your credit rating
- communicate with you during the course of providing our services, for example providing you with advice and dealing with your enquiries and requests
- prepare documentation to complete transactions and commence legal proceedings on your behalf
- carry out obligations arising from any contract entered into between you and third parties as part of your legal matter
- seek advice from third parties in connection with your matter
- prevent money laundering or terrorist financing in accordance with financial crime regulations
- to develop and carry out marketing activities
- to make and manage client/supplier payments
- to collect and recover money that is owed to us
- to manage risk for us and our clients
- to obey laws and regulations that apply to us
- to respond to complaints and seek to resolve them
- to run our business in a proper and efficient way which includes managing our financial position, business capability, planning communications, audit and governance

- to exercise our rights set out in agreements or contracts

Where we collect personal information from:

We collect data on the basis of the contract between us or to comply with our legal and regulatory obligations.

For prospective clients, we will process data on the basis of legitimate interest so that we can set up a meeting and give general advice.

We may electronically record or transcribe telephone calls, video appointments or face to face meetings we have with clients. We do this where necessary for our legitimate interests in maintaining accurate records and providing legal services efficiently. These recordings will be stored securely on your matter and only accessed by authorised staff involved in your matter. Any recordings will be retained only for the duration of our legal and regulatory data retention period applicable to your matter.

For enquirers and prospective clients:

We process personal information provided by prospective clients because it is necessary for our legitimate interests in [assessing enquiries, conducting conflict checks, determining whether we are able to provide legal services, preparing fee estimates and engagement documentation, maintaining records of consultations, and managing our legal practice].

To assist us in creating accurate records of meetings, we may use AI-assisted transcription technology. Where this technology is used, the conversation will be transcribed to produce a written record of the discussion. The transcript is reviewed by members of our team and any decisions regarding the services we provide, whether we are able to act for you, or the advice we give are made by appropriately qualified staff.

If you become a client of the firm, the transcript may be retained as part of your client file in accordance with our file retention policy. If you do not become a client, the transcript will normally be deleted within [X days] of the meeting unless we are required to retain it for legal, regulatory or legitimate business purposes.

For job applicants and our current and former employees, contractors and work experience personnel:

We collect personal information about people who work with us because we need to use that information to run our business. For example, the type of personal data we normally need might be a person's name, address, email address, identity

documents, family members' details, and bank details for processing payments. We will use this personal data to administer the contract we have with the people who work with us.

When individuals apply to work with us, we will only use the information they supply to us to process their application. We would obtain their consent to do that. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for 6 months after the recruitment exercise has been completed, it will then be destroyed or deleted.

Once a person has joined us, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be processed for purposes directly relevant to that person's employment contract. Once their employment has ended, we will retain the file in accordance with the requirements of our data retention policy and then destroy it.

Data you give to us:

- when you enquire about our services
- when you communicate with us through our various channels
- when you use our website
- when you apply for vacancies directly
- when you send us unsolicited personal data

We may collect personal information about you from third parties during the course of providing our legal services. The processing of this information will be necessary for the progression of your legal matter and to enable us to act in your best interests as your legal representative.

As a law firm we have an obligation to make you aware of anything that is relevant to your matter. When we obtain information about you from a third party rather than from you directly, we will notify you of any relevant information within a reasonable period and provide you with details including the type of data and source it came from.

Data from third parties we work with:

- individuals that introduce you to us
- recruitment agencies
- social networks
- other parties involved in the legal proceedings (such as the solicitor acting on the other side)
- financial institutions (such as banks involved in financing the transaction)
- other professional services firms (such as accountants and tax specialists)
- public information sources (such as Companies House)
- government bodies (such as HM Land Registry for details of your property)
- law enforcement agencies

How long we keep your data for:

We will only retain your information for as long as is necessary to:

- carry out the legal work
- maintain records according to rules that apply to us
- establish or defend legal claims (for example negligence claims) that could be made against us
- comply with legal obligations (anti-money laundering regulations say your identification and source of funds information must be kept for a minimum period from the conclusion of the matter).

Typically, once your matter is closed, we will store the information in accordance with advice issued to us by our regulator (the Solicitors Regulation Authority), the Law Society and our professional indemnity insurance providers. Please contact us for further details.

As regard recruited applicants whose data are stored in their personal file, the retention period of their data related to the selection procedure.

The retention period for any data or documents relating to non-recruited applicants, and unsolicited personal data, is twelve months.

Who your information will be shared with:

Based upon the services you need we may pass your details to selected people or organisations (data processors) to carry out certain activities on our behalf. For example, personal information you provide may be disclosed to our agents, who may keep a record of that information.

We may pass your information to any third parties where required to do so in the course of providing legal services, or where we are obliged by law. This will include, but is not limited to:

- a court or tribunal where we are acting for you in a dispute or litigation
- HM Revenue & Customs, regulators and other authorities
- our professional indemnity insurer in the event a claim is made against us in order to defend ourselves
- the solicitors acting on the other side of your matter
- expert Witnesses or Legal Counsel in order to obtain advice or assistance on your matter
- other professionals and service providers (such as insurance brokers, where you wish to take out an insurance policy as part of a transaction)
- any disclosures to law enforcement agencies where required by law (in particular the prevention of financial crime and terrorism)
- our regulators with any ongoing regulatory investigation
- the bank or building society or other lender providing finance in the transaction
- external auditors who may carry out independent checks of your file as part of our accreditations

We may also share your personal information if the make-up of Thomas & Co changes in the future:

- we may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them;
- during any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private;

- if any such change to our firm happens, then other parties may use your data in the same way as set out here.

At the outset of your matter, we may not be aware of all the other parties involved as this will depend on the specific nature of the work.

Security of your data:

Your data will be held on secure servers within the European Economic Area ("EEA") with all reasonable technological and operation measures put in place to safeguard it from unauthorised access. Where possible your identifiable information will be encrypted or minimised when stored in our systems.

Sending data outside of the EEA:

We will only send your data outside of the European Economic Area ('EEA') to:

- follow your instructions;
- comply with a legal duty.

If we do transfer information outside the EEA, we will make sure that during the transfer process it is protected in the same way as if it was being used in the EEA. We will use one of these safeguards:

- where possible transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website;
- where possible transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the

  EEA. You can find out more about data protection on the European Commission Justice website.

How you can access and update your information:

You have a right to request a copy of the personal information we hold about you, known as a data subject access request. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first to us, is updated or removed. These requests are free of charge and can be sent to the Martin Thomas at office@thomassolicitors.co.uk or at Caerglow House, The Square, Tisbury, Wiltshire SP3 6JP.

How you can object to us using your personal data or withdraw consent:

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the ‘right to object’ and ‘right to erasure’, or the ‘right to be forgotten’.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

Please note that if you want us to restrict or stop processing your data this may impact on our ability to provide our services. Depending on the extent of your request we may be unable to continue acting for you and be forced to immediately cease acting. In these situations, you would remain liable for the fees and disbursements incurred to date.

You can ask us to restrict the use of your personal information if:

- it is not accurate;
- it has been used unlawfully but you don’t want us to delete it;
- it not relevant any more, but you want us to keep it for use in legal claims;
- you have already asked us to stop using your data, but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data or ask us to delete it or restrict how we use it or, please contact us.

Moving your information to another organisation:

You have the right to request that we send a copy of the personal data we hold about you to another organisation for your own purposes, for example when you are dealing with a different service provider. If you would like us to move, copy, or transfer your information to another organisation please let us know. We will respond to you within one month after assessing whether or not this is possible, taking into account the technical compatibility with the other organisation in question.

Automated decision making:

We do not use your information for automated decision making.

Complaints about the use of your personal data:

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated by writing to Martin Thomas, at office@thomassolicitors.co.uk or to Caerglow House, The Square, Tisbury, Wiltshire SP3 6JP.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office. Find out on their website how to report a concern.

Cookies:

Our website uses cookies. Cookies are small text files that are placed on your computer or mobile device when you visit our website. Our website uses both session cookies and persistent cookies. Session cookies enable you to move from page to page within our website and any information you enter to be remembered. A session cookie is deleted when you close your browser or after a short time. Persistent cookies allow our website to remember your preferences and settings when you visit our website in the future. Persistent cookies expire after a set period of time. Cookies are used in the following ways on our website:

Google Analytics:

We use Google Analytics to provide us with information about how you use our website. We use this information to compile statistics and to help us to improve our website and the services we offer. Google uses cookies as part of this process to collect anonymous information, including the number of visitors to the website, where they have come to the website from, the pages they visit and the length of time they have spent on the website

Online application system:

We use session cookies on our online application system to assist in the navigation around the site. Please see our online application system privacy policy for more information**.**

Contact us:

We use a session cookie on our contact us page to allow you to contact us via our website.

The use of cookies in these ways is to improve the functionality of our website and your experience when using it. Cookies can be disabled by changing the settings on

your browser. If you do decide to disable cookies, you may not be able to access some areas of our website.

By using our website, you consent to our use of cookies as described above.

Website and disclaimer:

We will collect information supplied by you via this website. Such information may include, but is not limited to, your name, home and/or work addresses, email address and telephone numbers. We gather this information in order to respond to your enquiry. Information provided to us is subject to confidentiality and will not be disclosed without your prior consent to any third party, other than to an employee or member of the firm for the purpose of providing you with the service you require, or to comply with any applicable laws or lawful government and/or regulatory request.

This site is maintained for information purposes only. This site is not intended to be comprehensive and should not be treated as legal advice for any particular purpose. We accept no responsibility for any loss which may occur in reliance on the information contained on the site. Separate legal advice needs to be obtained for any particular situation. The contents of the site are governed by copyright and, apart from the permission already given on particular pages, written permission from the firm must be obtained before any copying of the contents can be undertaken

How Thomas & Co protects your information:

We have put in place various security procedures to protect your information including the instalment of firewalls to the computer system, limited employee access and system password protection.

Updating your details:

If any of the information that you have provided to us changes, for example, if you change your name or email address, please let us know the correct details by sending an email to office@thomassolicitors.co.uk.

How to contact Thomas & Co:

We welcome your views about this website and our Privacy Policy. If you would like to contact us with any queries or comments, please send an email to office@thomassolicitors.co.uk.