

HUMPHREYS  
LAW

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Humphreys Law  
Limited

Website privacy  
policy

Humphreys Law Ltd  
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London  
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[www.humphreys.law](http://www.humphreys.law)

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## 1 Introduction

- 1.1 This Privacy Policy is issued by **Humphreys Law Limited**, a private limited company registered in England and Wales with company number 10772058 and whose registered address is 20 Eastbourne Terrace, London, England W2 6LG (“**we**”, “**us**” and “**our**”).
- 1.2 References to “**you**” and “**your**” are to any person who browses and makes use of the Website, contacts us, requests information from us, or engages our Services.
- 1.3 We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit the Website (regardless of where you visit it from), contact us, request information from us, or engage our Services.
- 1.4 By using the Website or engaging our Services, and supplying data to us, you agree to be bound by the terms of this Privacy Policy.

## 2 Definitions and interpretation

- 2.1 In this Privacy Policy, the words and expressions set out below shall have the following meanings:

**Contact Data:** information enabling us to contact you, such as your email address, postal address, and telephone number(s).

**Cookie Policy:** the latest version of our cookie policy made available on the Website.

**Financial Data:** information including your bank account and payment details and details about payments made to and from you in connection with our Services.

**Identity Data:** information enabling us to identify you, such as your name (including name prefix or title), username or similar identifier, marital status, date of birth, gender, the company you work for, and job title.

**Legitimate Interest(s):** means the interest of our business in conducting and managing our business to enable us to achieve our aim to give you the best service/product and the best and most secure experience. We will consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [enquiries@humphreys.law](mailto:enquiries@humphreys.law).

**Marketing and Communications Data:** information about your preferences in receiving marketing from us and/or our third parties, and your communication preferences.

**Profile Data:** information about your interests, preferences, feedback and survey responses.

**Services:** the legal or other services supplied by us to you from time to time.

**Special Category Data:** information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, and genetic and biometric data.

**Technical Data:** your internet protocol 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 the Website.

**Usage Data:** information about how you use the Website and Services.

**Website:** the website accessed via the homepage [www.humphreys.law](http://www.humphreys.law).

- 2.2 References to a clause or a Schedule are to the relevant clause of or to the Schedule of this Privacy Policy.
- 2.3 Clause headings and the table of contents used in this Privacy Policy are inserted for ease of reference only and shall not affect construction.
- 2.4 Words importing one gender shall be treated as importing any gender, words importing individuals shall be treated as importing corporations and vice versa, words importing the singular shall be treated as importing the plural and vice versa, and words importing the whole shall be treated as including a reference to any part thereof.
- 2.5 References to statutory provisions or enactments shall include references to any amendment, modification, extension, consolidation, replacement or re-enactment of any such provision or enactment (whether before or after the date of this Privacy Policy), to any previous enactment which has been replaced or amended and to any regulation, instrument or order or other subordinate legislation made under such provision or enactment unless any such change imposes upon either party any liabilities or obligations which are more onerous than as at the date of this Privacy Policy.

### 3 **Purpose of this Privacy Policy**

- 3.1 This Privacy Policy aims to give you information on how we collect and process your personal data through your use of the Website (including any data you may provide through the Website when you sign up to our newsletter or take part in a survey), or when you contact us, request information from us, or engage our Services.
- 3.2 Our Website and Services are not intended for children and we do not knowingly collect data relating to children.
- 3.3 It is important that you read this Privacy Policy (together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you) so that you are fully aware of how and why we are using your data. This Privacy Policy supplements such other notices and is not intended to override them.

### 4 **Controller**

- 4.1 We are the controller and we are responsible for your personal data.
- 4.2 We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to data privacy. If you have any questions about this Privacy Policy,

including any requests to exercise your legal rights, please contact the DPO by writing to [enquiries@humphreys.law](mailto:enquiries@humphreys.law).

4.3 You have the right to make a complaint at any time to the Information Commissioner’s Office (“ICO”), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with any concerns you may have before you approach the ICO so please contact us in the first instance by email at [enquiries@humphreys.law](mailto:enquiries@humphreys.law).

4.4 If you are in the EU/EEA, you should contact the relevant supervisory authority in your territory. A list of the supervisory authorities across the EEA can be found at [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en).

## 5 **Changes to this Privacy Policy and your duty to inform us of changes**

5.1 We keep this Privacy Policy under regular review. This version was last updated on 12 January 2023. Historic versions can be obtained by contacting us.

5.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 6 **Third-party links**

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy of every website you visit.

## 7 **The data we collect about you**

7.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity information has been removed (anonymous data).

7.2 We may collect, use, store and transfer different kinds of personal data about you, which may include Identity Data, Contact Data, Financial Data, Technical Data, Usage Data, Marketing and Communications Data, and Special Category Data.

7.3 We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Such 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 the terms of this Privacy Policy.

## 8 **How is your personal data collected?**

8.1 We may collect personal data from you through direct interactions with you. For example, you may give personal data:

- (a) by filling in forms, corresponding with us by post, phone, email or otherwise, give us feedback, subscribe to our service or publications, or request for marketing to be sent to you;
- (b) as part of our client onboarding process when you instruct us (whether in your own capacity or on behalf of a company or otherwise) to provide our Services;
- (c) throughout the course of our engagement by you for our provision of applicable Services.

8.2 We may also collect personal data from you through automated technologies or interactions. As you interact with the Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookie Policy for further details.

8.3 We may collect and/or receive personal data about you from third parties or publicly available sources, including but not limited to:

- (a) Companies House, the Electoral Register, HM Land Registry or other authorities;
- (b) credit reference agencies, sanctions screening providers, client due diligence providers, and search information providers (such as RiskScreen);
- (c) analytics providers (for Technical Data);
- (d) our information technology systems, such as:
  - (i) our case management, document and time recording systems;
  - (ii) reception logs;
  - (iii) monitoring of our Website and technical systems (communications systems, emails, computer networks etc)
- (e) consultants and other professionals (including, but not limited to, barristers) we may engage in relation to your matter, or who may be referring matters to us; and
- (f) other third parties from whom we may need to collect your personal data, having obtained your consent, such as:
  - (i) your bank or building society, another financial institution or advisor;
  - (ii) your employer and/or trade union, professional body or pension administrators;
  - (iii) your doctors, medical and occupational health professionals.

## 9 **How we use your personal data**

9.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) where we need to perform the contract which we are about to enter into or have entered into with you;
- (b) where it is necessary for our Legitimate Interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- (c) where we need to comply with a legal or regulatory obligation; and/or
- (d) where you have consented to our processing your personal data.

9.2 Where we process Special Category Data, we will normally rely on the following special processing conditions:

- (a) where the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- (b) where you have given us your explicit consent; and/or
- (c) where the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent.

## 10 **Purposes for which we will use your personal data**

10.1 Set out in Schedule 2 is a description of the ways we intend to use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

10.2 Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data where more than one basis has been set out in Schedule 2.

## 11 **Marketing**

11.1 We strive to provide you with choices regarding certain personal data uses, such as those in relation to marketing and advertising.

11.2 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

11.3 You will receive marketing communications from us if you have requested information from us and, in each case, you have not opted out of receiving that marketing.

We will seek and obtain your express opt-in consent before we share your personal data with any company outside us for marketing purposes.

11.4 You can ask us or third parties to stop sending you marketing messages at any time by contacting us by email at [enquiries@humphreys.law](mailto:enquiries@humphreys.law).

11.5 Your opting out of receiving marketing messages will not have an impact on the personal data you provided us in connection with other purposes, such as your instructing us for the provision of our Services.

## 12 **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

## 13 **Change of purpose**

13.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose for which it was collected. If you wish to receive an explanation, when we use your personal data for another purpose, as to how the processing for the new purpose is compatible with that original purpose, please contact us by email at [enquiries@humphreys.law](mailto:enquiries@humphreys.law).

13.2 Please note that we may process your personal data without your knowledge or consent, in compliance with this Privacy Policy, where it is required or permitted by law.

## 14 **Disclosures of your personal data**

14.1 We may share your personal data with:

- (a) HM Revenues & Customs, courts, tribunals or any other regulators and/or authorities who require reporting of processing activities in certain circumstances;
- (b) professional advisers, which may include legal, financial and business advisors, bankers, auditors, insurers, and insurance brokers;
- (c) third parties we may work with in relation to providing you with legal or other client services, including barristers and other specialists/experts, and foreign law firms for the purposes of sourcing in local advice in foreign jurisdictions;
- (d) our external auditors in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- (e) our service providers such as those providing services relating to money laundering and terrorist financing checks, credit risk reduction and other similar services, client and document management, technology and IT services. Such service providers include, for example, Zoho Corporation (our relationship management platform) and NetDocuments (our content management platform);
- (f) third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.



14.2 We require our third-party service providers to respect the security of your personal data and to treat it in accordance with the law.

14.3 We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 15 **International transfers**

15.1 Subject to the terms of this Privacy Policy, we may transfer your personal data outside the European Economic Area (“**EEA**”) or the UK; and by using our Website and/or our Services, you consent to our doing so.

15.2 Whenever we transfer your personal data out of the EEA and/or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

(a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or the UK (as applicable).

(b) If we transfer your personal data to any other country which is not subject to an adequacy decision of the European Commission or the UK (as applicable) regarding an adequate level of protection of personal data, we will ensure that there is a legal basis and, if required, a relevant safeguard method for such data transfer so that your personal data is treated in a manner that is consistent with, and respects the applicable laws and regulations on data protection in the EEA or the UK (as applicable).

(c) Where we use certain service providers, we may use specific contracts approved by the European Commission or the UK (as applicable) which give personal data the same protection it has in Europe.

15.3 Please contact the DPO if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or the UK.

## 16 **Data security**

16.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

16.2 We have put in place procedures to deal with suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We also have the following security measures in place:

(a) SSL authentication;

(b) Google Recaptcha on all forms; and

(c) Sucuri basic security protection.

## 17 Data retention

17.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

17.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

17.3 Details of retention periods for different aspects of your personal data are available upon request by emailing [enquiries@humphreys.law](mailto:enquiries@humphreys.law).

## 18 Your legal rights

18.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include the right to:

- (a) request access to your personal data;
- (b) request correction of your personal data;
- (c) request erasure of your personal data;
- (d) object to processing of your personal data;
- (e) request restriction of processing your personal data;
- (f) request transfer of your personal data; and
- (g) right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact [enquiries@humphreys.law](mailto:enquiries@humphreys.law).

18.2 These rights are further detailed in Schedule 1.

18.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

18.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no

right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

18.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

19 **Governing law and jurisdiction**

19.1 This Privacy Policy and any dispute, claim or obligation (whether contractual or non-contractual) arising out of or in connection with it, its subject matter or formation shall be governed by and construed in accordance with the laws of England and Wales.

19.2 The parties irrevocably agree that the courts of England and Wales shall have exclusive jurisdiction to settle any dispute or claim (whether contractual or non-contractual) arising out of or in connection with this Privacy Policy, its subject matter or formation.

## Schedule 1

You have the right to:

- 1 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.
- 2 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.
- 3 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 continuing 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.
- 4 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 lawful basis 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 lawful basis to process your information which override your rights and freedoms.
- 5 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.
- 6 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.
- 7 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 Services. We will advise you if this is the case at the time you withdraw your consent.

## Schedule 2

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest in the following circumstances:
To manage our relationship with you which will include notifying you about changes to our terms or this Privacy Policy, asking you to leave feedback, and updating our client records	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Special Category Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our Legitimate Interests (e.g., to provide you with our Services and to make sure we can keep in touch with our clients about existing and new offerings)</li> <li>• Necessary to comply with a legal obligation</li> <li>• Your explicit consent (for Special Category Data)</li> <li>• Necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity (for Special Category Data)</li> </ul>
To provide our Services (including client onboarding, managing the Services provided, managing payments, fees and charges, and recovering any sums owed to us)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Financial</li> <li>• Special Category Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our Legitimate Interests (e.g., to provide you with our Services and to recover sums due to us)</li> <li>• Necessary to comply with a legal obligation</li> <li>• Your explicit consent (for Special Category Data)</li> <li>• Necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity (for Special Category Data)</li> </ul>
To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our Legitimate Interests (e.g., for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>

<p>To use data analytics to improve the Website, Services, marketing, client relationships and experiences</p>	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our Legitimate Interests (e.g., to keep the Website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
<p>To enforce legal rights or defend or undertake proceedings</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Profile</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our Legitimate Interests (e.g., to protect our business, interests and rights)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<p>Marketing our Services and those of selected third parties, including to existing and former clients and third parties who have previously expressed an interest in our Services.</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our Legitimate Interests (e.g., to promote our business)</li> </ul>

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