



## Privacy Statement

Gladstones Solicitors are a Data Controller in terms of the General Data Protection Regulations (GDPR), and are registered with the Information Commissioner, under Registration Number **Z2712000**.

<https://ico.org.uk/ESDWebPages/Entry/Z2712022>

Gladstones Solicitors are authorised and regulated by the Solicitors Regulation Authority, under ID Number **559050**.

<https://www.sra.org.uk/consumers/register/organisation/?sraNumber=559050>

Gladstones Solicitors are highly committed to the security of processing personal data. We take our obligations extremely seriously and have the relevant technical safeguards in place to uphold our obligations.

## What information do we hold about you?

Gladstones processes and holds both basic identifying personal data and special category personal data (also known as sensitive data) for individuals under the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

### Personal Data

Personal data is information relating to an individual, who can be identified from that data/information. For example;

- Name (forename/middle name/surname)
- Address (current and previous) including post code
- Date of Birth
- Contact telephone number(s) mobile, landline and work
- Email Address(s)

We may also hold personal information about you relating to the matter we are pursuing you for, such as;

- Photographs
- Correspondence
- Telephone call recordings (note; retained for 30 days from the date of the call)
- Vehicle details (registration, make and model)
- Financial information (balance owing, payment transactions)

*\*This list is not exhaustive*

### Special Category Personal Data

Special Category personal data, also known as sensitive data, relates to;

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Data concerning health
- Data concerning sex life or sexual orientation
- Criminal convictions

### Clients of the firm

If you are a client of the firm, you will have provided us with various information, such as;

- Name
- Address
- Contact details (telephone number/email address)
- Date of Birth

*\*This list is not exhaustive*

We need these details so that we can properly represent you, and also for our legal and regulatory obligations, i.e. our due diligence checks including complying with Money Laundering Regulations and the Criminal Finances Act.

Depending on the type of matter we are assisting you with, we are also likely to hold special category (sensitive) data. For example

- Data concerning your health, by way of medical records
- Data concerning your ethnic origin, when obtaining photographic identification

*\*This list is not exhaustive*

When in receipt of special category data, we process this data when necessary for establishing, exercising or defending legal claims, and providing legal advice.

#### Non-Clients of this firm

If you are involved in proceedings or any case other than as our client, then we will hold personal data about you, in order that we can properly record and carry out the instructions of our client, which may also include special category data. For example;

- Name (forename/middle name/surname)
- Address (current and previous) including post code
- Date of Birth
- Vehicle Registration Number/Make/Model (past and present)
- Outstanding balance owing
- Medical/health conditions
- Ethnic origin
- IP Address(s) (when registering to utilise our website portal)

*\*This list is not exhaustive*

When in receipt of special category data, we process this data when necessary for establishing, exercising or defending legal claims, and providing legal advice to our client(s).

Where an authorised Third Party has been given consent by you to engage with our firm, on your behalf, we will process (where applicable) their personal data, to allow our firm to engage with them, at your request.

#### Why do we process your information and what is the legal basis for doing so?

##### Clients of the firm

As per Article 6 of the General Data Protection Regulations, there must be a lawful basis in which personal data is processed.

We process and hold information about you, so that we can properly represent you in the matters for which we are instructed, in conjunction with our own regulatory requirements. Under the GDPR, our lawful bases for processing is;

- Performance of a Contract  
This could be a contract that we are representing you in relation to, and/or our contract of services with you
- Compliance with a Legal Obligation  
We are required to hold certain data in order to comply with legislation, such as the Money Laundering Regulations
- Legitimate Interest  
Our Regulator (The Solicitors Regulation Authority) require us to hold and maintain records, for compliance purposes, so that such records are available, should they be required. Also, should a complaint or dispute arise, we can have recourse to our file in order to address the same.

#### Non Clients of the firm

We process and hold information about you, so that we can properly represent our clients for matters in which we are instructed. Under the GDPR, our lawful basis for processing is;

- Legitimate Interest  
We process and hold information about those who are involved in legal or potential legal proceedings with our client. As a law firm this information is necessary and lawful, as it is required in furtherance of our client's instruction and so that we can properly advise our client, and act for them on their rights and obligations. For example;
  - When acting on behalf of one party during a separation
  - When recovering a debt/monies owed to our client

During the course of our instruction from our client, we will also process information in the following ways;

- Conducting reviews/audits
- Dealing with dissatisfaction and complaints
- To provide training

*\*This list is not exhaustive*

#### Who might we share information with?

##### Clients of the firm

We will only share your information with those necessary in order to comply with our obligations to you, and our regulatory obligations, in furtherance of your instructions and in relation to other issues concerning the performance of our contract with you. For example;

- Solicitors acting on the other side
- HM Courts and Tribunal Service
- Contracted Suppliers
- Law Enforcement/Emergency Services

*\*This list is not exhaustive*

There may be occasions when your data is transferred to a third country (out of the European Economic Area) during the performance of our contract with you, for instance where the other side to a dispute is resident abroad, or the case involves another party, or witness who is located abroad.

Data will only be transferred if necessary for the performance of the contract between yourself and Gladstones, or if the transfer is necessary for the establishment, exercise or defence of legal claims

We will of course at the relevant time, explain any risks involved.

#### Non Clients of the firm

We will only share your data with other persons, companies, regulators, supervisory bodies, government entities, and others, to the extent necessary to reasonably exercise our clients rights in furtherance of our contract of services with them. For example;

- Tracing Agents (whom carry our soft searches i.e. not visible on credit record)
- Enforcement Agents
- Solicitors/Advocates
- HM Courts and Tribunal Service
- Service Providers, i.e. printing providers, IT service providers, communication providers, card payment providers
- Debt Management Companies
- Insolvency Service
- Law Enforcement

*\*This list is not exhaustive*

In addition, there will be the disclosure of your data, if Gladstones are subject to a Government or Regulatory Audit, for example from HM Revenue and Customs, or the Solicitors Regulation Authority, in accordance with our legal and regulatory obligations.

In addition, there will be disclosure of your data if a Complaint is made to a regulatory body, for example the Information Commissioner's Office or the Solicitors Regulation Authority, where we need to reply and engage with the relevant body.

When your information is shared with third parties, under a contract of services with our client, we will ensure that the third party have provided us with the necessary assurances, and have the relevant technical and organisational measures in place to ensure that they will comply with their obligations under the GDPR, and do not use your data, otherwise in accordance with our instructions, or other than in accordance with the request they have made.

#### Who may provide your information to us?

##### Clients of the firm

Information will be provided to us by you, others involved in any legal process, those referring work to us (for example banks/building societies) and those providing us with instructions on your behalf, if they have the necessary authority to do so.

### Non Clients of the firm

The majority of your information will come from our client (or an entity on behalf of our client), when we are instructed on their behalf. It may also come from third parties whilst we carry out our clients' instructions (or who act on our clients behalf). For example; tracing agents, debt management companies, insolvency service, authorised third parties).

### How long do we hold your information?

#### Clients of the firm

As we are acting for you under a contract of services, we need to retain all data for a minimum of 6 years, to enable us to have recourse to it, should any issues arise, under the performance or otherwise of that contract. We will not retain data for any longer than 7 years.

We are also under a duty to comply with various legislation, such as the Money Laundering Regulations, which require us to hold data for a specific period of time, namely, at least 5 years.

In some circumstances, data may be held longer than is indicated above, for example;

- When we have been instructed to store a Last Will and Testament
- When we have been instructed to store Deeds to a property
- When we have been instructed to store a Lasting Power of Attorney
- When there is any ongoing dispute/claim/complaint

*\*This list is not exhaustive*

In circumstances where we hold your data for longer than the standard retention period, when storing important documentation, this will be on the basis of your Consent. Your Consent being provided within our Terms and Business.

In the circumstances whereby there is ongoing dispute/claim/complaint, the data will be retained for as long as is necessary to deal with the same.

#### Non Clients of the firm

Your data forms a record of our performance of a contract of services with our client, and therefore we retain your data for a minimum period of 6 years, but no longer than 7 years, from the date in which the matter you were involved comes to an end.

*Further specific information can be provided, upon request.*

At the expiration of the aforementioned retention periods, we will securely dispose of your data, in all formats.

We can confirm that once the matter in which you were involved comes to an end, your data will then simply be retained in accordance with our retention period. During the retention period, your data will only be processed further in circumstances whereby we have to adhere to regulatory or legislative obligations.

For example;

- Respond to a Complaint
- Defend a Claim
- Respond to a request under the GDPR

*\*This list is not exhaustive*

### How can you access the information we hold about you?

All data subjects, with regards to personal data, have the following rights;

- The right to information and access of personal data
- The right to rectification
- The right to erasure, also known as “the right to be forgotten”
- The right to the restriction of processing
- The right to data portability
- The right to object to processing
- Rights in relation to automated decision making and profiling

*\*Please note this firm does not undertake automated decision making and/or profiling*

Further information on the rights available to data subjects can be found on the website of The Information Commissioner; [www.ico.org.uk](http://www.ico.org.uk)

Any request for access to personal information we are processing can be made to our DPO/Compliance Department;

Gladstones Solicitors Limited  
Unit B  
1<sup>st</sup> Floor  
210 Cygnet Court  
Centre Park  
Warrington  
WA1 1PP

[DataProtectionOfficer@gladstonessolicitors.co.uk](mailto:DataProtectionOfficer@gladstonessolicitors.co.uk)

We will provide all information that you are entitled to under the subject access provisions, promptly, without delay and within the statutory time frame. There is no charge for providing you with this information.

#### **Important**

**In some circumstances we may need identification information from you in order to carry out this request.**

**Please be aware that some information we hold about individuals, other than our clients, is subject to Legal Professional Privilege and is therefore exempt from the rights of access, that otherwise applies to data subjects.**

### How can you request rectification of your information?

The accuracy of data is very important to us.

Any request to rectify inaccurate or incomplete data we hold can be made to our DPO/Compliance Department;

Gladstones Solicitors Limited  
Unit B  
1<sup>st</sup> Floor  
210 Cygnet Court  
Centre Park  
Warrington  
WA1 1PP

[DataProtectionOfficer@gladstonessolicitors.co.uk](mailto:DataProtectionOfficer@gladstonessolicitors.co.uk)

We will inform you promptly, without delay and within the statutory time frame if the rectification has been carried out, or refused. We will always inform any third party with whom we have shared the data with, of any rectification carried out.

When the accuracy of information is contested, you have the right to request a restriction of processing of your information.

**Important**

**In some circumstances we may need identification information from you in order to carry out this request.**

**Please be aware that in some circumstances it may be the information you are requesting us to amend is subject to Legal Professional Privilege, or we are unable to amend the information as we are required to act under our client's instructions, we are doubtful of it, due process requires otherwise, or a legitimate interest exists as to why we are unable to amend it.**

**How can you request the erasure of your information?**

Any request to have information held by this firm erased can be made to our DPO/Compliance Department;

Gladstones Solicitors Limited  
Unit B  
1<sup>st</sup> Floor  
210 Cygnet Court  
Centre Park  
Warrington  
WA1 1PP

[DataProtectionOfficer@gladstonessolicitors.co.uk](mailto:DataProtectionOfficer@gladstonessolicitors.co.uk)

We will inform you promptly, without delay and within the statutory time frame if the erasure has been carried out, or refused.

**Important**

**In some circumstances we may need identification information from you in order to carry out this request.**

**Please be aware of the basis in which we process your personal data, as this can result in an exemption of the request to erase data, where the processing or retention is necessary.**



### How can you make a data portability request?

#### Clients of the firm

Any request to receive your information to re-use the same for a third party can be made to our DPO/Compliance Department;

Gladstones Solicitors Limited  
Unit B  
1<sup>st</sup> Floor  
210 Cygnet Court  
Centre Park  
Warrington  
WA1 1PP

[DataProtectionOfficer@gladstonessolicitors.co.uk](mailto:DataProtectionOfficer@gladstonessolicitors.co.uk)

We will provide the information provided to us by you in a commonly used format, promptly, without delay and within the statutory time frame.

#### Non Clients of the firm

We are not able to make information available to you under the data portability provisions, as we are not providing a service to you. Our services are provided to our client.

### How can you request to object to the processing of your information?

Any request to object to your information being processed can be made to our DPO/Compliance Department;

Gladstones Solicitors Limited  
Unit B  
1<sup>st</sup> Floor  
210 Cygnet Court  
Centre Park  
Warrington  
WA1 1PP

[DataProtectionOfficer@gladstonessolicitors.co.uk](mailto:DataProtectionOfficer@gladstonessolicitors.co.uk)

We will inform you promptly, without delay and within the statutory time frame if the objection is upheld, or refused.

#### **Important**

**In some circumstances we may need identification information from you in order to carry out this request.**

### How do we ensure the security of your information?

Gladstones safeguards all personal data, in a number of ways;

- A strong firm commitment to the protection of personal data
- Dedicated Data Protection Officer and Compliance Department
- Access Controls
- Internal Policies and Procedures
- Encryption
- Password Protection
- Electronic Controls

*\*This list is not exhaustive*

Gladstones treat personal data with the upmost importance and take the security of data seriously at all times, acting in accordance with both our legislative obligations under the GDPR and regulatory obligations, as an authorised and regulated law firm.

Please note; whilst our firm will always aim to be transparent, we may not always feel it reasonable to provide details descriptions of the technical and organisational measures and safeguards we have in place, as this information is commercially sensitive to our business.

### If you wish to make a complaint about the processing of your information or have concerns or questions about the processing of your information

Any complaint regarding the processing or retention of your personal data can be made to our DPO/Compliance Department;

Gladstones Solicitors Limited  
Unit B  
1<sup>st</sup> Floor  
210 Cygnet Court  
Centre Park  
Warrington  
WA1 1PP

[DataProtectionOfficer@gladstonessolicitors.co.uk](mailto:DataProtectionOfficer@gladstonessolicitors.co.uk)

Should you wish to make a complaint regarding the processing or retention of your personal data by this firm, you can make a complaint to the Supervisory Authority;

The Information Commissioner (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

0303 123 1113  
[www.ico.org.uk](http://www.ico.org.uk)

We must also confirm that you also have the right to a judicial remedy (i.e. claim compensation through the courts), if you remain unsatisfied with the outcome of a complaint to the Supervisory Authority and you believe there has been a breach of the General Data Protection Regulations 2018.

The ICO cannot award compensation and so if you cannot reach an agreement on the amount of compensation where appropriate, you can apply to court.

You should seek independent advice at any stage that you feel it necessary.

#### Changes to this Privacy Statement

Our Privacy Statement is regularly reviewed

The Privacy Statement was last updated; 10 August 2025