



NINESTJOHNSTREET

PRIVACY POLICY

9 St John Street Chambers is committed to safeguarding the privacy of any personal data that we have in our possession. Personal data is any information relating to an identifiable individual and includes data received in respect of both clients who instruct us and visitors to our website.

This policy explains how we may collect and use personal data and how we intend to keep it secure. Should we ask you to provide certain information by which you can be identified, either in the course of the services we provide or when using this website, then you can be assured that it will only be used in accordance with this privacy policy.

We may change this policy from time to time by updating this notice on our website. You should continue to check its contents to ensure that you are content with any changes made. Our web address is: www.9sjs.com

1. DATA PROTECTION MANAGER

Should you have any questions about this policy, want to exercise your right to see a copy of the information that we hold about you, want to ask us to delete information we hold about you, or think that information we hold may be incorrect, you may contact our Data Protection Manager – Rachel Swift by emailing her at rachel.swift@9sjs.com or by writing to her at, Chambers of Christopher Kennedy QC, 9 St John Street, Manchester, M3 4DN.

Our Data Protection Manager is registered with the Information Commissioner's Office ('ICO') for the information that we hold.

2. DATA COLLECTION

The majority of the information that we hold about you is provided by yourself when you seek to use our services.

We may also collect personal data:

- Via Social media or other digital platforms such as our Website
- Directly from a third party such as the Crown Prosecution Service
- Directly from a third party with your consent such as medical records or insurance companies
- Via our GDPR Compliant Case Management System and general IT system

3. OUR LAWFUL BASIS FOR PROCESSING YOUR INFORMATION

The General Data Protection Regulation ('GDPR') requires all organisations that process personal data to have a lawful basis for doing so. The lawful basis for processing contained within Article 6 of the GDPR are:

- **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary to comply with the law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Examples of legitimate interests include:

- Where the data subject is a client or in the service of the controller;
- Transmission within a group of undertakings for internal administrative purposes;
- Processing necessary to ensure network and information security, including preventing unauthorised access;
- Processing for direct marketing purposes, or to prevent fraud; and
- Reporting possible criminal acts or threats to public security.

The lawful basis that 9 St John Street Chambers relies on to process data are: consent, contract, legal obligation and legitimate interests.

Personal data will be held at our Chambers at 9 St John Street, or by our service providers. All information is stored within the European Economic Area. If there is a requirement to transfer data to a non-EEA Country we will ensure that transfer complies with data protection law.

4. THE PERSONAL DATA WE COLLECT

All personal information we collect about you will be recorded, used and protected by us in accordance with the data protection legislation and this privacy policy.

Examples of data collected

- Name, address, telephone or mobile numbers, email address
- Date of Birth
- Information to allow us to verify your identity
- Financial details including bank account details and National Insurance number

- Details of social media presence
- Details of family members
- Employment status details
- Nationality, Immigration status, Ethnic Origin, Sexual orientation etc.
- Trade Union Membership details
- Medical records

Data collected via our Website

9 St John Street Chambers and its staff monitor visits to our website. Our site is owned by 9 St John Street Chambers who, for the purposes of data protection governance, including the General Data Protection Regulation, is a Data Controller.

We will only contact you with news, offers and opportunities from us, if you provide your consent.

We may collect your name and job title, your contact details including your email address or we may collect demographic information such as postcode, preferences and interests. The information we collect is used to improve the website so that you are able to benefit from it. The information that we collect in this process may identify you as an individual; however, we do not seek to identify individual visitors unless they volunteer their contact details through one of the forms on the site.

In some circumstances, our records will identify organisations visiting our site and we may use that information in managing our relationships with those organisations; for example, in considering how to develop the services that we offer them. Various forms on our site invite you to submit your contact details and other information about yourself or your organisation, or to send us emails which will, of course, also identify you. In each case, the purpose for which you are invited to give us information is clear and we also indicate which of the requested information is essential for the relevant purpose and which is optional – fields for essential information are marked with an asterisk.

If we propose to use your details to send you information from 9 St John Street Chambers about barrister bookings, events or legal developments, which we believe may be of interest to you (other than information that you have specifically requested), we give you the ongoing opportunity to tell us that you do not consent to receiving this information, by ticking a box.

We will not use your information for purposes that are not clear when you provide your details and will not disclose them to third parties except in the following limited circumstances:

- if we are under a legal or regulatory duty to do so,
- if it is necessary to do so to enforce our contractual rights,
- if it is necessary to lawfully assist the police or security services with the prevention and detection of crime or terrorist activity,
- where such disclosure is necessary to protect the safety or security of any persons, and/or
- otherwise as permitted under applicable law.

How we use cookies

A cookie is a small file which 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. We may use traffic log cookies to identify which pages are being used. This helps analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other third party websites of interest. It is important to note that once these links have been used, you have left our site and we have no control over the site to which you have been directed. We cannot be responsible therefore for the protection and privacy of any information provided to such sites and they are not governed by our privacy policy.

5. HOW WE MIGHT SHARE OR TRANSFER YOUR DATA

We may share your personal data with:

- Third party contractors and suppliers, necessary to administer 9 St John Street Chambers
- Barristers within 9 St John Street Chambers
- Our legal advisors in the event of a dispute or other legal matter;
- Law enforcement officials, government authorities, or other third parties to meet our legal obligations;
- Any other party where we ask you and you consent to the sharing.

If we intend to rely on a third party to process any personal data, we ensure that they too have taken appropriate measures of data protection compliance in order to protect data.

We may transfer your data if a Barrister of these Chambers, changes his practising address or if we change providers.

Wherever possible, we will not share your information without your specific consent to do so.

6. DATA RETENTION

We will retain your personal data only for as long as is reasonably necessary for the required services to be provided to you. When our service to you is complete we will retain your personal data for no longer than seven years unless there is a specific legal obligation to retain it for longer. This will enable us to keep records required by law, to show that we treated you professionally and fairly and to enable us to respond to questions, claims or complaints which may be raised.

7. YOUR RIGHTS AS A DATA SUBJECT

The GDPR gives you specific rights concerning your personal data. These rights include:

- Right of information and access to confirm details about the personal data that is being processed about you and to obtain a copy;
- Right to rectification of any inaccurate personal data;
- Right to erasure of personal data held about you (in certain circumstances);
- Right to restriction on the use of personal data held about you (in certain circumstances);
- Right to portability – right to receive data processed by automated means and have it transferred to another data controller;
- Right to object to the processing of your personal data.

We will respond to any request to exercise these rights within one month. Should you wish to exercise any of these rights you should contact Ruth Bailey.

8. SECURITY OF INFORMATION

9 St John Street Chambers takes the security of your personal information seriously. When you submit your data to us, we use industry standard Secure Sockets Layer (SSL) encryption technology to guard your information.

We have Policies in place to ensure that our paper based and electronic systems are only accessed by those with the correct authority.

Members of Staff and Chambers access our digital network and platforms by way of secure password through a GDPR compliant case management system.

We also have compliant procedures in place to deal with any Data Protection breaches. Should there be a breach, we will notify you where we are legally required to do so.

9. COMPLAINTS

If you have a complaint and our Data Protection Manager is unable to deal with it satisfactorily, you may write to the Information Commissioner's Office at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

1 February 2019