

JACKY LEWIS FAMILY LAW

Client Data Protection Information Notice

1. Introduction

This document sets out the obligations of **Jacky Lewis Family Law** (the ‘Firm’) regarding data protection and your rights as our client (‘data subjects’) in respect of your personal data under the UK General Data Protection Regulation (‘UK GDPR’) which sits alongside the Data Protection Act 2018 (‘DPA 2018’), and Privacy and Electronic Communications Regulations 2003 (‘PECR’). The Firm is also subject to the Data (Use and Access) Act 2025 (‘DUAA’), which reforms data protection and promotes the secure and effective use of data, including both personal and non-personal information.

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

The UK GDPR defines “personal data” as any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This document sets the Firm’s obligations regarding the collection, processing, transfer, storage, and disposal of your personal data. The Firm has implemented procedures and policies for our employees, agents, contractors, or other parties working on behalf of the Firm to follow at all times.

The Firm is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. Lawful, Fair, and Transparent Data Processing

The UK GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights as the data subject.

As you are a client of the Firm and have contracted with us to provide you with the necessary legal assistance, under the UK GDPR we are allowed to process your personal data as a necessity for the performance of the contract.

We collect and use your personal data to provide legal services. If you do not provide personal data we ask for, it may delay or prevent us from providing those services.

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3. **The Data Protection Principles**

The UK GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

- Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to the implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of the data subject.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

4. **Keeping You Informed**

The Firm shall provide the information set out below to every client:-

- Where your personal data is collected directly from you, you will be informed of its purpose at the time of collection; and
- Where your personal data is obtained from a third party, you will be informed of its purpose:
 - If the personal data is used to communicate with you, when the first communication is made; or
 - If the personal data is to be transferred to another party, before that transfer is made; or
 - As soon as reasonably possible and in any event, not more than one month after the personal data is obtained.

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5. **How Your Personal Data Is Collected**

We collect most of this information from you, direct. However, we may also collect information:

- From publicly accessible sources, e.g. Companies House or HM Land Registry;
- Directly from a third party, e.g.:
 - Sanctions screening providers;
 - Credit reference agencies;
- From a third party with your consent, e.g.:
 - Your bank or building society, another financial institution or advisor;
 - Consultants and other professionals we may engage in relation to your matter;
 - Your employer and/or trade union, professional body, or pension administrators;
 - Your doctors, medical and occupational health professionals;
- Via our website—we use cookies on our website (for more information on cookies, please see the Cookies Policy on our website).
- Via our information technology (IT) systems.

6. **How and Why We Use Personal Data**

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- Where you have given consent;
- To comply with our legal and regulatory obligations;
- For the performance of a contract with you or to take steps at your request before entering into a contract; or
- For our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our clients and verify their identity	To comply with our legal and regulatory obligations

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What we use your personal data for	Our reasons
Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator	
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to protect our business, interests, and rights
Gathering and providing information required by or relating to audits, enquiries, or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training, and quality control.	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: —for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information; —to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	Depending on the circumstances: —for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us; —to comply with our legal and regulatory obligations

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What we use your personal data for	Our reasons
Protecting the security of systems and data used to provide services	To comply with our legal and regulatory obligations We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Updating client records	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract; —to comply with our legal and regulatory obligations; —for our legitimate interests, e.g. making sure we can keep in touch with our clients about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: —to comply with our legal and regulatory obligations; —for our legitimate interests, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Credit reference checks via external credit reference agencies where applicable	For our legitimate interests, i.e. to ensure our clients are likely to be able to pay for our services
External audits and quality checks	Depending on the circumstances: —for our legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards; —to comply with our legal and regulatory obligations
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to

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What we use your personal data for	Our reasons
with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary	protect, realise or grow the value in our business and assets

7. **How and Why We Use Your Personal Data—Special**

Certain personal data we collect is treated as a special category to which additional protections apply under data protection law:

- Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, or trade union membership;
- Genetic data;
- Biometric data (when used to uniquely identify an individual);
- Data concerning health, sex life or sexual orientation.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- We have your explicit consent;
- The processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- The processing is necessary to establish, exercise or defend legal claims.

8. **Sharing of Personal Data**

During our retainer with you we may share your information with the following entities:-

- Courts and Tribunals;
- Experts required to advise or provide reports;
- Barristers & Barristers Chambers;
- Accountants;
- Our Professional Advisors;
- Opposing Lawyers and representatives;
- Solicitors Regulation Authority;
- Legal Ombudsman;
- Banks and Lenders;
- Mediation and Arbitration Service providers;
- Government Bodies;
- Auditors;
- IT support, infrastructure, and system providers;
- Employees of the Firm;

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- Contractors to the Firm working on your matter;
- Postal service providers, including couriers;
- Insurers and Brokers;
- HM Land Registry;
- Other third parties we use to help us run our business, e.g. website hosts;
- Third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- Credit reference agencies and card payment providers.
- Our external auditors, e.g. in relation to the audit of our accounts or files, or systems and processes;
- Other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency, usually, information will be anonymised, but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Where we outsource to third party providers, we only allow those organisations to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

9. **Marketing**

The Firm does not retain or use existing or former clients' data for marketing purposes.

10. **Personal Data Collected, Held, and Processed**

The following personal data is collected, held, and processed by the Firm:-

Data Ref.	Type of Data	Purpose of Data
Client Name	Your Name	To identify you
Address	Your Address	To send letters to you
Email address	Your email address	To send communication via email
Mobile telephone	Your mobile telephone number	To communicate with you by phone and/or by text
Date of Birth	Your date of birth	To identify you
Passport Number	Your passport details	To identify you and comply with Money Laundering and Sanctions Regulations – where applicable
Driving licence number	Your driving licence details	To identify you and comply with Money Laundering and Sanctions Regulations – where applicable

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Data Ref.	Type of Data	Purpose of Data
Utility Bill	Your utility bill (s)	To identify you and comply with Money Laundering and Sanctions Regulations – where applicable
Matter Information	Matter history and associated information	Information relating to the matter in which you are seeking our advice or representation
Credit Check	Your finance/credit information	Information to enable us to undertake a credit or other financial checks on you
Financial Data	Your financial information	Your financial details so far as relevant to your instructions, e.g. the source of your funds if you are instructing on a purchase transaction
Client Service Data	Your access to our communication systems	Information about your use of our IT, communication and other systems, and other monitoring information

11. **Personal Data Collected for Compliance with the Firm's Regulatory Responsibilities**

Pursuant to Regulation 41 of *The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017* and *The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 and 2022*, the Firm will only use any personal data provided for the purpose of complying with the regulations and for the prevention of money laundering or terrorist financing.

12. **Where Your Personal Data Is Held**

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see **section 7, 'Sharing of Personal Data'**).

13. **How Long Your Personal Data Will Be Kept For**

We will not keep your personal data for longer than we need it for the purpose for which it is used or as agreed with you.

As a general rule, if we are no longer providing services to you, we will delete or anonymise your account data after seven years. However, different retention periods apply for different types of personal data and for different services as set out in our **Client Care Letter** and **Terms and Conditions**.

Following the of the relevant retention period, we will delete or anonymise your personal data.

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14. Your Rights (As a Data Subject)

The UK GDPR sets out the following rights applicable to data subjects (please refer to the parts of this notice indicated for further details):

- The right to be informed;
- The right of access;
- The right to rectification;
- The right to erasure (also known as the ‘right to be forgotten’);
- The right to restrict processing;
- The right to data portability;
- The right to object;
- Not to be subject to automated individual decision making;
- The right to withdraw consent.

15. Data Subject Access Requests

You may make **Subject Access Requests** (‘SAR’)s at any time to find out more about the personal data that the Firm holds about you, what it is doing with that personal data, and why.

If you wish to make a SAR you may do so in writing. SARs should be addressed to the Firm's **Data Compliance Manager**, who is **Jacqueline Lewis**. You should send your request by: email to jacky@jackylewisfamilylaw.co.uk or post to **Jacqueline Lewis, Data Compliance Manager, Jacky Lewis Family Law, Global House, 1 Ashley Avenue, Epsom, Surrey, KT18 5AD**, or make it by telephone to **01372 253377**.

Responses to SARs shall normally be made within one month of receipt, however, we may extend by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, you shall be informed.

All SARs received shall be handled by the Firm’s **Data Compliance Manager**.

The Firm does not charge a fee for the handling of normal SARs. However, we reserve the right to charge reasonable fees for additional copies of information that has already been supplied to you, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

16. Rectification of Personal Data

You have the right to require us to rectify any of your personal data that is inaccurate or incomplete.

The Firm shall rectify the personal data in question, and inform you of that rectification, within one month of you informing our Firm of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.

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In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

17. Erasure of Personal Data

You have the right to request that the Firm erases the personal data it holds about you in the following circumstances:

- It is no longer necessary for the Firm to hold your personal data with respect to the purpose(s) for which it was originally collected or processed;
- You wish to withdraw your consent to the Firm holding and processing your personal data;
- You object to the Firm holding and processing your personal data (and there is no overriding legitimate interest to allow the Firm to continue doing so);
- The personal data has been processed unlawfully;
- The personal data needs to be erased in order for the Firm to comply with a particular legal obligation.

Unless the Firm has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and you will be informed of the erasure, within **one month of receipt of your request**. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.

In the event that any personal data that is to be erased in response to your request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

18. Restriction of Personal Data Processing

You may request that the Firm ceases processing the personal data it holds about you. If you make such a request, the Firm shall retain only the amount of personal data concerning you (if any) that is necessary to ensure that the personal data in question is not processed further.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

19. Objections to Personal Data Processing

You have the right to object to the Firm processing your personal data based on legitimate interests and direct marketing (including profiling). The Firm does not however, process personal data for marketing purposes.

Where you object to the Firm processing your personal data based on its legitimate interests, the Firm shall cease such processing immediately, unless it can be demonstrated that the Firm's legitimate grounds for such processing override your

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interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

20. **Withdrawing Consent**

If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time.

You may withdraw consent by contacting our **Data Compliance Manager by: email to jacky@jackylewisfamilylaw.co.uk** or post to **Jacqueline Lewis, Data Compliance Manager, Jacky Lewis Family Law, Global House, 1 Ashley Avenue, Epsom, Surrey, KT18 5AD** or by telephone to **01372 253377**.

Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

21. **More Information on How to Exercise Your Rights**

To find more information on how you may exercise your rights as a Data Subject, please see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

22. **Keeping Your Personal Data Secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

23. **How to Complain**

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to Contact Us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the UK Information Commissioner's Office.

The UK's Information Commissioner's Office may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

24. **Changes to this Notice**

We may change this notice from time to time. If we do, we will inform you.

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25. How to Contact Us

You can contact our **Data Compliance Manager** by post, email, or telephone if you have any questions about this notice or the information that we hold about you, to exercise a right under data protection law or to make a complaint.

The contact details are:-

Email: jacky@jackylewisfamilylaw.co.uk

Address: Jacqueline Lewis, Data Compliance Manager, Jacky Lewis Family Law,
Global House, 1 Ashley Avenue, Epsom, Surrey, KT18 5AD

Telephone: 01372 253377

I HEREBY CONSENT TO THE MATTERS CONCERNING DATA PROCESSING OF MY DATA WHICH ARE SET OUT ABOVE. I UNDERSTAND THAT I MAY AT ANY TIME WITHDRAW MY CONSENT AS EASILY AS I HAVE GIVEN IT.

Name [print] _____

Signature _____

Date _____

**Do you have parental responsibility for a child whose information you have given us?
YES / NO**

If you have provided information to us about a child or children, please sign below to indicate your consent to us holding that information for the purposes of your case and the advice you want from us.

I HEREBY CONSENT TO YOU HOLDING AND/OR PROCESSING DATA ABOUT THE CHILD OR CHILDREN WHOSE DETAILS I HAVE PROVIDED TO YOU FOR THE PURPOSES OF MY CASE. I UNDERSTAND THAT I MAY AT ANY TIME WITHDRAW MY CONSENT AS EASILY AS I HAVE GIVEN IT.

Name [print] _____

Signature _____

Date _____