

## Privacy Notice for Third Parties

### What is the Purpose of this Document?

Howes Percival LLP (“the Firm” or “we”) is committed to protecting the privacy and security of your personal data.

This privacy notice describes how we collect and use personal data about you during and after your engagement with us, in accordance with UK data protection laws, including the Data Protection Act 2018.

This privacy notice applies to third parties including but not limited to referrers, counsel and experts. It does not form part of any contract of engagement. We may vary, amend, alter or replace this privacy notice at any time.

Where any information we hold about a third party is subject to legal professional privilege or our duties of confidentiality, we are exempt from the requirement to provide information as to how that data is processed. Accordingly, where any personal data we process is subject to legal professional privilege or our duties of confidentiality, it is not covered by this privacy notice.

The Firm is a “data controller”. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the UK GDPR to notify you of the information contained in this privacy notice.

### Data Protection Principles

We will comply with data protection law and principles, which means that your personal data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of Personal Data we hold about you

“Personal data” means any information about an individual from which that person can be identified. It does

not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Location of employment or workplace.
- Your qualifications and work history (where appropriate)
- Your employer (if applicable) and your role within your employers business.
- Your bank details where you have provided these to us to enable us to either make a payment to or receive a payment from you.
- Performance information.
- CCTV footage (at our Northampton, Leicester and Norwich offices) and other information obtained through electronic means such as building alarm access records.

#### **How is your Personal Data Collected?**

We collect personal data about you in a variety of ways:

- During meetings with you, on the telephone, by email or at in-person events.
- Through your chambers in the case of counsel.
- Through our own research and/or social media.
- Through your employer or any other organisation with which you are associated or operate.

#### **How we will use Personal Data about you generally**

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:

- Where we need to perform the contract we have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party such as our client) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be rare:

- Where you have consented to us doing so.
- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

### Situations in which we will use your Personal Data

We need all the categories of information in the list above (see; *the kind of information we hold about you*) primarily to allow us to perform our contract with you (we reference this below with a "Contract"). In some cases we may use your personal data to pursue legitimate interests of our own or those of third parties including our clients (we reference this below with a "Legitimate Interest"), provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal data are listed below. We have indicated the purpose or purposes for which we are processing or will process your personal data as explained above.

Purpose	Legal Basis
Determining the terms on which you work for us.	Contract and Legitimate Interest
Administering the contract we have entered into with you.	Contract
For financial purposes, including billing, making payments to you and in providing cost rates and information about fees to clients.	Contract and Legitimate Interest
Assessing suitability for a particular client or matter.	Legitimate Interest
Making decisions about your continued engagement.	Legitimate Interest
<p>To monitor access to our buildings for security purposes via alarm access codes and CCTV, which ensures the security of our business and the safety of our employees and visitors, and to detect and prevent crime. We only have CCTV in operation in the Northampton, Norwich and Leicester offices.</p> <p>At our Northampton office; we have one camera that covers the entrance to our car park, giving a view of the barrier arm, key pad and intercom. A second camera covers the front entrance to our building and an area of the car park which is part of our demise. The images from both cameras are only viewable from behind our reception desk.</p>	Legitimate Interest

Purpose	Legal Basis
<p>At our Norwich office the CCTV monitors the main reception entrance (inner and outer doors), the entrance to the car park and the alleyway from the car park to the main road. It primarily covers those visiting our offices (but is angled so as not to cover members of the public walking by) and cars entering our car park.</p> <p>At our Leicester office, the CCTV monitors the main entrance, the car park, and the full perimeter of the building. It primarily covers those visiting our offices (but is angled so as not to cover members of the public walking by) and cars entering our car park. Again, the CCTV operates for 24 hours a day, and this Data is continuously recorded.</p> <p>Images from cameras can be viewed from the reception desk at the relevant office and in secure setting by authorised personal for a short period after (save if there is a legal basis for keeping footage long, such as in the event of a criminal investigation).</p>	<p>Legitimate Interest</p>
<p>For providing relevant information and services to clients and prospective clients for business purposes which may include your work email addresses and contact numbers, providing your relevant credentials and experience to them, and ensuring the smooth conduct of the matter.</p>	<p>Legitimate Interest</p>
<p>Instructing you to act for our clients or advise our clients.</p>	<p>Legitimate Interest</p>
<p>Marketing our services including managing our CRM and eMarketing databases, targeting/acquiring new clients and networking with referrers and other contacts.</p>	<p>Legitimate Interest</p>

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

**If you fail to provide Personal Data**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you), or we may be prevented from complying with our legal obligations. We will let you know if this is the case.

### **Change of Purpose**

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. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Do we need your Consent?**

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the specific information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your engagement with us that you agree to any request for consent from us.

### **Automated Decision-Making**

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a re-consideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal data, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## Data Sharing

We may have to share your data with third parties, including our clients, opponents in legal or tribunal proceedings, courts and tribunals and our third-party service providers (further details of which are set out below).

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal data outside the UK and European Economic Area but if we do so we will ensure we have a lawful basis to do so (see: *Transferring Information outside the European Economic Area*).

If we do, you can expect a similar degree of protection in respect of your personal data.

## Why might you share my Personal Data with Third Parties?

We will share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

## Which Third-Party Service Providers process my Personal Data?

"Third parties" includes third-party service providers (including contractors and designated agents). The activities are carried out by third-party service providers include: IT and archiving services (including Mimecast, Proofpoint, Wardle Keach, Oasis/Iron Mountain etc.) and our internet providers, Grandad, our PR providers (Gordon Maw).

We may use third parties to manage our CRM and eMarketing databases (currently IntApp and AWS) and share your personal data with sponsors for the purpose of joint networking events which are hosted through Eventbrite.

## How Secure is my Information with Third-Party Service Providers?

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## What about other Third Parties?

We may share your personal data with other third parties, for example in the context of restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law and may share your data with our clients, the courts and/or tribunals (as appropriate) as well as with opponents in legal or tribunal proceedings and the other side in other matters.

### **Transferring Information outside the UK or European Economic Area (“EEA”)**

We do not envisage transferring your data outside of the UK or EEA, save that it may from time to time be necessary to transfer some of your details to clients and prospects outside of the UK or EEA (such as business contact details, name, telephone number, email address, and specialisms etc.). Where any transfer of your personal data outside the UK or EEA is to take place we will always ensure that we have a lawful basis for doing so and that appropriate safeguards are put in place to protect your information.

### **Data Security**

We have put in place appropriate measures to protect the security of your information.

Further details of those measures can be obtained on request from the Data Protection Officer.

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

### **Data Retention**

#### **How long will you use my Personal Data for?**

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, accounting, or reporting requirements. Details of retention periods for different aspects of your personal data are available in our retention policy and schedule further details of which are available from the Data Protection Officer.

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 requirements. We also take into account the limitation periods applicable for making any claims against us which features in our decision-making on retention.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer engaged by the Firm we will retain and securely destroy your personal data in accordance with our data retention policy and schedule.

### **Rights of Access, Correction, Erasure, and Restriction**

#### **Your duty to inform us of Changes**

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 working relationship with us.

## Your rights in connection with Personal Data

Under certain circumstances, by law you have the right to:

- **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.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. Please note that we may need to verify the accuracy of the new personal data that you provide.
- **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 exercised your right to object to processing (see below). Please note, however, that we may not always be able to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **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 ground. 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 grounds to process your personal data which override your rights and freedoms.
- **Request the restriction of processing** of your personal data in certain circumstances. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to you or to another party. This right only applies to automated information for which you initially provided consent for us to use, or where we used the information to perform a contract with you.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to you or another party, please contact the Data Protection Officer in writing.

### No fee usually required

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

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

### **Right to Withdraw Consent**

In the limited circumstances where we have relied on your consent to the collection, processing and transfer of your personal data for a specific purpose (which will be rare); you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Data Protection Officer**

We have appointed Hannah Steggles, Partner, as our data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO at [hannah.steggles@howespercival.com](mailto:hannah.steggles@howespercival.com). 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.

### **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

*The Firm's Data Protection Officer is responsible for this Notice which was adopted on 15 October 2024 and last updated on 8 February 2026*