

Privacy Notice for Clients

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. It provides you with certain information that must be provided under UK data protection laws, including the Data Protection Act 2018.

You have been referred to this privacy notice because you have instructed the Firm to advise you and/or to represent you.

The Firm is a "data controller". This means that we are responsible for deciding how we hold and use personal data about you.

"Personal data" means any information about you from which you can be identified. It does not include data where your identity has been removed or which is not associated with or linked to your personal data and is therefore anonymous data.

In many instances the vast majority of personal data we collect about you, and use, will be subject to legal professional privilege and to that extent, such personal data is exempt from certain provisions under the data protections laws. We are also a regulated legal professional business, regulated by the Solicitors Regulation Authority ("SRA") and are subject to their rules, which include a need to comply with the SRA Principles, SRA Code of Conduct for Firms and the SRA Code of Conduct for Individuals, RELs and RFLs. This does not mean that we will not put in place appropriate protections when handling and processing your personal data or that your personal data will not be kept confidential. As a regulated firm, we owe you a strict professional duty of confidentiality in respect of all information you provide to us and will only use your information when authorised to do so and for the purposes of acting for you, having regard to our overriding duty to the Courts and to certain regulatory authorities.

Data Protection Principles

We will comply with data protection laws. This says that the personal data we hold about you must 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 information we hold about you

We will hold personal data and, in some cases, "special category" personal data which is more sensitive personal data which requires a higher level of protection.

The personal data we collect, store and use about you will vary dependant on the purposes for which you have instructed us to act on your behalf. Generally, such personal data will include the following:

- your name, address and contact details (including email address),
- personal details and information relevant to the matter you have instructed us about (including background and ancillary information that we may need to be aware of). For example, if you have instructed us to act for you in relation to an impending divorce, such information might include details of your marriage, children, the nature of your relationship, issues relating to your sex life (if relevant to the matter), financial dependence and/or behaviour during the marriage etc,
- identification information (e.g. passport, driver's licence, utility bills, companies house details) to comply with our anti-money laundering obligations and criminal proceeds checks,
- details of your bank account and/or credit card details (e.g. if you provide us with bank details so that we can make payment to you),
- your financial history and details of your assets if relevant to your matter,
- details of your current employment (if relevant) and issues relating to your employment (if relevant),
- credit history and checks for the purposes of setting credit limits for the work we do for you,
- records of instructions received and advice given,
- reports from third parties (e.g. medical reports) where relevant to your matter,
- information about your health (including disabilities) if relevant to your matter or our duty to make reasonable adjustments under the Equality Act 2010,
- details of protected characteristics under the Equality Act where relevant to your matter or where required for equality, diversity and inclusion reporting,
- personal data regarding your family if relevant to your matter, or
- CCTV images at our Northampton, Leicester and Norwich offices and details from our visitor signing in books at each of our premises.

We may also collect, store and use the following "special categories" of more sensitive personal data:

- information about your racial or ethnic origin, religious beliefs, sexual orientation and political opinions.
- information about your health, including any medical condition, health and sickness records.
- information about criminal convictions and offences.

How is your Personal Data Collected?

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

- during meetings with you (including virtual meetings via video conferencing platforms) where we will record your instructions and the advice given to you in writing.
- where you provide us with personal data on the telephone, by email, at in-person events or through other mediums.
- through our own research and/or social media and/or our investigation into your matter or through third parties (where relevant to your matter or in accordance with our regulatory requirements).
- from parties and/or their solicitors that we may be communicating with for the purposes of acting for you.

We collect personal data in hard copy form in client files and electronically by email and on our case and document management systems (currently Aderant and NetDocuments respectively) and using other media. We may also collect information on our mobile phones and/or other computer equipment which we use to enable us to undertake our work for you.

How we will use Personal Data about you?

We will only use personal data we collect about you to:

- advise you,
- assess your case or matter,
- take instructions,
- communicate with third parties as part of acting for you,
- protect your interests,
- check your identification for anti-money laundering and criminal proceeds purposes,
- assess any credit limit we apply to you,
- deal with and manage insurance claims against us and/or to assess risk and/or to obtain insurance,
- comply with our regulatory requirements,
- comply with the law or any court orders,
- market our services,
- manage our CRM and eMarketing databases,
- to invite you to events which we run and to provide you with information and updates which we consider to be relevant to you and which are similar to the matters we have advised you upon previously,

- pursue your matter on your behalf in accordance with your instructions,
- invoice you,
- collect payment from you for our services and any expenses and disbursements,
- instruct third parties to act for you (e.g. counsel, experts etc) or to advise you (e.g. where we do not have such specialism),
- assist with managing our communications and relationship with you, and
- manage your visits to our premises (if any) and the security of our premises. This includes, if you attend our Northampton, Leicester or Norwich offices, CCTV recording image. Broad details of our CCTV is below (and further details can be found in our CCTV and Covert Monitoring Policy):
 - 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. There is a second camera which covers the front entrance to our building and an area of the car park which is part of our demise.
 - 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.
 - 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.
 - images from cameras can be viewed from the reception desk at the relevant office or in a secure setting by authorised personnel for a short period after (save if there is a legal basis for keeping footage longer, such as in the event of a criminal investigation).

In most instances the personal data we collect about you will be subject to legal professional privilege and as such it is subject to certain exemptions under the data protection legislation.

We will rely on one or more of the following legal basis for processing your personal data:

- we have received your consent,
- it is necessary to perform our contract with you,
- it is necessary to comply with a legal obligation,
- it is needed in the public interest,
- it is necessary for our legitimate interests (our legitimate interests are those of a regulated law firm and business, undertaking work for you and marketing our services to you and others), or
- it is needed to protect your interests (or someone else's interests).

If you fail to provide Personal Data?

If you fail to provide data when requested, which is necessary for the matter we are dealing with for you, we may not be able to continue acting for you. This may mean that we are unable to advise and/or act for you further. We will let you know if this is the case.

How we use particularly Sensitive Personal Data?

“Special categories” of particularly sensitive personal data require higher levels of protection. This includes the following information: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic/biometric data, health, sex life or sexual orientation.

We will use special categories of personal data in the following ways:

- where you consent to us doing so for the purposes of advising you and/or acting for you and where relevant to your matter,
- where it is necessary for the establishment, exercise or defence of legal claims,
- in respect of your disability status, to consider whether we need to provide appropriate adjustments to our buildings or services, or
- in respect of your race or ethnic origin, religious or philosophical beliefs, or your sex life or sexual orientation, to ensure meaningful equality, diversity and inclusion monitoring and reporting.

Information about Criminal Convictions

We may have to collect information about criminal convictions, if relevant to your matter and if lawful for us to do so.

We will ensure that we have in place appropriate safeguards when processing this type of information, and will seek to do so in accordance with our regulatory obligations, and/or our Data Protection Policy (where relevant).

Automated Decision-Making

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.

Data Sharing

We may have to share your personal data with third parties for the purposes of acting for you, in connection with providing you with services, to deal with our regulatory requirements (e.g. to verify your identity and carry out anti-money laundering and criminal proceeds checks), for professional indemnity insurance purposes. In some situations, we may instruct third parties to advise and/or act for you (e.g. counsel, experts, medical professionals etc.).

We require third parties to respect the security of your data and to treat it in accordance with the law and/or our instructions or as part of our regulatory or insurance obligations.

What about other Third Parties?

We may share your personal data with other employees/consultants employed by the Firm as part of acting for you (but subject to our professional duties of confidentiality) and/or other third parties for the purpose of advising or providing services to us, acting for you directly, representing your interests, to deal with regulatory compliance (including to verify your identity and to carry out anti-money laundering and criminal proceeds checks), for professional indemnity insurance purposes or otherwise to market our services .

We may, from time to time, use third parties as part of our services to you. For example, we may use third party software/platforms to provide: 1) data rooms; 2) client, case or document management systems and related services; 3) artificial intelligence tools for legal work or 4) video conferencing facilities. Where we engage a third party in this manner who will, or may, process your personal data on our behalf we will ensure that there are appropriate and legally required contractual and practical protections in place to safeguard your personal data.

If you choose to pay our invoices online, we use a third party to provide that option (currently, Legl). Our payment service provider will process your personal data in order to provide the online payment facility, in accordance with our agreement with them, and in accordance with their privacy notice (for Legl, their privacy notice is available on their website – accessible here).

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

Data Security

We have put in place measures to protect the security of your personal data. Details of these measures are available upon request.

Save where they are acting as a controller of your personal data in their own right, as may be the case with certain third parties such as counsel and our insurers, third parties will only process your personal data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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.

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 have in place a File Retention and Destruction Policy. We also have in place a Data Retention Policy that sets out the criteria we adopt for retaining your personal data.
- The criteria we consider when retaining your personal data includes:
 - what our regulators (SRA) instruct us to do with client information,
 - any requirements of our professional indemnity insurers,
 - the statutory limitation periods for bringing any claims (including negligence claims) against the Firm,
 - our legal obligations (e.g. holding ID for anti-money laundering purposes), and
 - any on-going matters we have for you that may be relevant to the work we do for you.

Rights of Access, Correction, Erasure and Restriction

Your rights in connection with Personal Data

- This section only applies to the extent that the personal data we hold about you is subject to the UK data protection laws.
- 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. In most instances the personal data we hold about you will be subject to legal professional privilege and will be subject to our professional duty of confidentiality and may be subject to our right of lien.
 - **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 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. As noted above, in most instances the personal data we hold about you will be subject to legal professional privilege and will be subject to our professional duty of confidentiality and may be subject to our right of lien.
- 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 another party, please contact initially your Client Care Partner (identified in your engagement letter) in writing.
- No fee usually required
 - You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive or where such information is outside the UK data protection laws. 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
 - Where we have relied on your consent for the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Client Care Partner/Minder identified in the client care letter sent to you at the outset of your matter. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. This may also mean that we have to cease acting for you if this compromises our ability to be able to do so.

- 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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO and therefore ask that you contact us in the first instance.

Data Protection Officer

We have appointed Hannah Steggles, partner, as our Data Protection Officer 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 Hannah Steggles at hannah.steggles@howespercival.com.

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.

If you have any questions about this privacy notice, please contact Hannah Steggles, Partner.

The Firm's Data Protection Officer is responsible for this Notice which was last updated in February 2026.