

## **Privacy policy**

### **Privacy policy of:**

**Eleanor Sanders**

**One Pump Court**

**ICO reference: ZA106421**

**Policy became operational on: 14 February 2022**

**Next review date: 14 February 2023**

### **Privacy Policy**

In order to provide legal advice and representation, I need to collect and hold personal information. This may be your personal data or information relating to other parties involved in the matter. I may also need to process personal data for other reasons. I will protect your personal information. I will ensure that I do not do anything that may infringe your rights or undermine your trust. This privacy notice describes the information I collect about you, how it is used and shared, and your rights regarding it.

### **Data controller**

I am registered with the Information Commissioner's Office (ICO) as a Data Controller for the personal data that I hold and process as a barrister. My registered address is One Pump Court, Elm Court, Temple, London EC4Y 7AH and my ICO registration number is ZA106421. If you wish to contact me in relation to your information, please email my clerks (Chambers staff) at [clerks@onepumpcourt.co.uk](mailto:clerks@onepumpcourt.co.uk), or write to Chambers using the address above.

### **Data collection**

**If you are a client**, all the information that I hold about you is provided to or gathered by me in the course of my work for you, such as preparing and presenting your tribunal or court case or providing you with legal advice. Please see my **client care letter** for more information on how I work for you. Your solicitor and/or I will tell you why we need the information and how we will use it. Most of the information I hold about you is provided to me by your solicitor, but I may also obtain information from the public domain or from third parties, such as other legal professionals or experts, members of the

public, your family and friends, witnesses, courts and other tribunals, investigators, government departments, regulators, public records and registers.

**If you are a client**, some of the information you provide will be protected by legal professional privilege unless and until the information becomes public in the course of any proceedings or otherwise. As a barrister **I have an obligation to keep your information confidential**, except where it is already or otherwise becomes public, is disclosed as part of the case or proceedings (in the course of which it may become available to the public, unless restrictions apply), or where disclosure is otherwise permitted, such as by operation of law. For more information on my professional duties please see the Bar Handbook.

### **What data do I process about you?**

I collect and process both personal data and special categories of personal data as defined in the GDPR.

This may include:

- Name
- Email address
- Phone number
- Address
- Payment or bank details
- Date of birth
- Next of kin details
- Details pertaining to education and employment
- Information on your background & current circumstances
- Financial information.

Where relevant, I may also need to process special category personal data that reveals your:

- Racial or ethnic origin
- Political opinions
- Religious and philosophical beliefs
- Trade union membership

- Genetic data
- Biometric data for the purpose of uniquely identifying a natural person
- Data concerning health
- Sex life and sexual orientation.

On occasion, I may also process personal data relating to criminal convictions and offences.

### **My lawful basis for processing your information**

The General Data Protection Regulation (the GDPR) requires all organisations that process personal data to have a lawful basis for doing so. The lawful bases identified in the GDPR that I seek to rely upon are as follows:

- **Consent of the data subject.**
- **Performance of a contract with the data subject or to take steps to enter into a contract.**
- **Compliance with a legal obligation.**
- **The legitimate interests of my business or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.**

Examples of legitimate interests include:

- Where the data subject is a client or in the service of the controller;
- Provision of legal services and advice;
- Processing is necessary to ensure network and information security, including preventing unauthorised access;
- For purposes of practice management, accounting and debt recovery;
- For completion of professional regulatory requirements;
- Processing for direct marketing purposes, or to prevent fraud; and
- Reporting threats to public security.

### **Special category processing**

I process special category data when:

1. I have your explicit consent to do so; or
2. It is necessary for the exercise or defence of legal claims or judicial acts.

### **Criminal data processing**

On occasion, I process data relating to criminal offences where it is necessary for:

- The purpose of, or in connection with, any legal proceedings;
- The purpose of obtaining legal advice; or
- The purposes of establishing, exercising or defending legal rights.

### **Where permissible, I may use your information to:**

- Provide legal advice and representation (this may include discussions with other professionals);
- Assist in training pupils (trainee barristers) and mini-pupils (persons receiving work experience from Chambers);
- Investigate and address your concerns;
- Communicate with you about news, updates and events;
- Investigate or address legal proceedings relating to your use of my services, or as otherwise allowed by applicable law;
- Perform my professional and legal obligations, such as completing my tax returns.
- Assist in applications for the purpose of professional development or career progression;
- Communicate legal updates and judgments, such as in legal journals.

**I will only share your information if sharing is consistent with my obligations. I may share your personal data with:**

- Data processors, such as my Chambers staff, IT support staff, email providers, data storage providers;
- Other barristers, trainees or staff within my Chambers;
- Your solicitor or others assisting you with your case;
- Other individuals connected with your case, such as witnesses or experts;
- Other parties or their legal representatives involved in your case;
- Courts and tribunals, including judges and staff;
- The Legal Aid Agency;
- Regulatory, professional, complaints and/ or government bodies, such as the Bar Standards Board, the Bar Council, the Information Commissioner's Office and the Legal Ombudsman;
- Professional advisers, such as my accountants and insurers;
- Professional organisations, such as the Immigration Law Practitioners' Association;
- Legal directories and publications;
- I may also be required to disclose your information to third parties such as the police, intelligence services or other government agencies, **only where required or permitted by law.**

### **Transfers to third countries and international organisations**

I do not ordinarily transfer any personal data to third countries or international organisations. If I am required to transfer I will only do so when satisfied that such transferred data is fully protected and safeguarded as required by the GDPR.

### **Data retention**

My Retention and Disposal Policy (copy available on request) details how long I hold your data for and how I dispose of it when it no longer needs to be held. I will delete the information I hold about you at your request unless:

- There is an unresolved issue, such as a claim or dispute;
- I am legally required not to do so; or
- There are overriding legitimate business interests not to do so.

**Your rights**

The GDPR gives you rights over your personal data. You can ask for a copy of the personal information I hold about you, you can ask me to correct any inaccuracies with the personal data I hold, and you can ask me to stop processing your details. If I do something irregular or improper with your personal data, you may seek compensation for any distress you are caused or loss you have incurred. You can find out more information from the ICO's website: [http://ico.org.uk/for\\_the\\_public/personal\\_information](http://ico.org.uk/for_the_public/personal_information). The ICO is the organisation that you can complain to if you are unhappy with how I have dealt with your query.

**Accessing and correcting your information**

You may request access to, correction of, or a copy of your information by contacting me.

**I will occasionally update my privacy notice.** I will publish the updated notice on my Chambers' website profile.