

SEARS TOOTH PRIVACY POLICY

MAY 2018

INTRODUCTION

Sears Tooth is a specialist in family law practice. In business for over 25 years, we have unrivalled experience across the whole spectrum of family law for winning complex cases at first instance and on appeal, including cases involving jurisdiction, divorce and children.

At Sears Tooth, we consider that the privacy of all data we hold is fundamental to the continued success of the company.

Sears Tooth values its relationships with its clients, contacts and prospective clients and recognises that a failure to protect any of the data it holds would undermine those relationships, and we would fail to honour our obligations. Accordingly, Sears Tooth commits to implement this policy effectively and consistently.

This privacy policy describes our principles and approach to privacy, and we shall regularly review both the policy and the practices and procedures which are intended ensure it is effective.

TERMINOLOGY

Sears Tooth “Sears Tooth” or “we” or “company”

PERSONAL INFORMATION

Sears Tooth offers legal services to individuals. As such, we intentionally hold personal data for individuals in compliance with our legal obligation together with personal data for our staff, stakeholders, and the contact details of our clients.

CONTRACTUAL REQUIREMENTS

Where Sears Tooth provides services to any client, organization or individual in a legal capacity, we shall have a contractual requirement to hold relevant information about those services.

Besides holding the official contact details of individuals acting for the client, the nature of the services being provided may include consequential processing of personal information. Sears Tooth shall store and process data for as long as we provide the client with services, followed by an appropriate retention period following the cessation of any services. This will be done in according to all legal obligations.

MARKETING COMMUNICATIONS

Sears Tooth may maintain a marketing database of professional individuals who have consented to our periodic correspondence. This database may include the name, telephone numbers, email address, professional relevance to us, and a record of the correspondence we have had with each person.

These individuals may ask to inspect their personal contact details, correct them or unsubscribe from our communications at any time. The email address of individuals wanting to unsubscribe may be retained so that we know that they should never be contacted again.

CHILDREN'S DATA

As a specialist family law practice, Sears Tooth stores the personal information of children under the age of 13, in compliance with our legal obligations.

WEBSITE DATA COLLECTION

Sears Tooth follows common practices by analysing web site visits, using cookies, and storing data about each session and the device used. This data is anonymous and not correlated with any personal information. The purpose of gathering this information is to improve the content and design of our website, and not to profile individuals or capture any personal information.

Where we may provide services on our website which require a login and personal identification information, the individual shall be advised that they are giving consent to our creating an individual account for them. The individual shall have the right to close their account with us and request all their data is deleted after an appropriate period of retention.

INFORMATION SECURITY MEASURES

Sears Tooth operates an Information Security Program to protect all the data it holds, including personal information. This means that there are technical controls in place to protect all computers and devices used to store, process and access confidential information, with additional access controls, staff training and regular reviews of these measures.

ENCRYPTION

Sears Tooth shall always encrypt the personal data it holds, both in transit and when at rest. Generally, wherever possible and appropriate, encryption techniques shall be deployed to avoid unnecessary risk; as a baseline, it shall be ensured that data is always encrypted across public networks and when stored on devices in the public realm.

THIRD PARTY DUE DILIGENCE

Sears Tooth uses technical services from external providers, including services on the internet, to make its operations more effective, for example – operating resilient systems on the Microsoft Azure cloud platform, or processing payments through an online payment provider such as PayPal. In such cases, we will conduct due diligence on the service provider to make sure their data protection measures are sufficient to protect the personal information they will hold on behalf of Intersys IT.

Before using a service provider for data processing, Sears Tooth shall conduct a risk assessment of the vendor. A contract between Sears Tooth and each data processor shall provide the assurance that personal data is protected appropriately, and individual rights are respected.

RIGHTS OF THE INDIVIDUAL

Individuals have a right to see any personal information that Sears Tooth may hold about them, and to ask that it is corrected if inaccurate, and even to ask that their personal information is deleted. Any person wishing to exercise these rights should make a formal written 'subject access request' to the address at the end of this policy.

In some circumstances, Sears Tooth may be obliged to keep records even after an individual has requested that it is deleted. However, this would be unusual and we would delete any such information as soon as our obligation has expired.

We cannot respond to requests for personal information made by email, because we cannot ensure the privacy of the communication, so requests of this type must be made by post.

NO SHARING

Sears Tooth shall not share, disclose or move personal information to any other person or organization unless under a legal obligation to do so.

POLICY CHANGE

Sears Tooth may change this Privacy Policy from time to time. This may be to improve clarity, communication, or to reflect changes we have made to our privacy practices.

QUESTIONS

If you have any questions or feedback about this policy or your privacy, contact us by email privacy@searstooth.com or in writing at the following address:

SEARS TOOTH LIMITED

8 Upper Grosvenor St, Mayfair

London W1K 2LY