

## FOX WILLIAMS LLP CLIENT DATA PROTECTION STATEMENT

This Policy was last updated on: 1 January 2026

### 1. INTRODUCTION

- 1.1 In the course of our acting for you, we may receive information relating to you, your directors, shareholders, beneficial owners, employees, agents, associates, family members and other individuals that you deal with or have personal data about. In this Policy, we refer to this information as “**personal data**”, meaning any information relating to an identified or identifiable individual.
- 1.2 This Policy sets out the basis on which we will process this personal data. Please read the Policy carefully to understand our practices regarding personal data and how we will use it.

### 2. ABOUT FOX WILLIAMS LLP

- 2.1 The controller in respect of personal data is Fox Williams LLP, a limited liability partnership registered in England and Wales under number OC320160. Our registered office is at 10 Finsbury Square, London, EC2A 1AF.
- 2.2 Fox Williams LLP is registered with the Information Commissioner’s Office under registration number Z9541811. Fox Williams LLP is authorised and regulated by The Solicitors Regulation Authority.
- 2.3 References in this Policy to “**FW**”, “**we**”, “**our**” and “**us**” are references to Fox Williams LLP.

### 3. CONTACTING US

- 3.1 We are not required to appoint a formal Data Protection Officer under data protection laws. However, we have appointed a Privacy Manager, who is Nigel Miller.
- 3.2 If you have any questions about this Policy or your information, or to exercise any of your rights as described in this Policy or under applicable data protection laws, you can contact us as follows:

By post: Privacy Manager (Nigel Miller), Fox Williams LLP, 10 Finsbury Square, London EC2A 1AF

By email: [privacy@foxwilliams.com](mailto:privacy@foxwilliams.com)

By telephone: +44 (0)20 7628 2000

### 4. DATA PROTECTION PRINCIPLES

- 4.1 Anyone processing personal data must comply with the principles of processing personal data as follows:
  - **Lawfulness, fairness and transparency** – data must be processed lawfully, fairly and in a transparent manner.
  - **Purpose limitation** – data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

- **Data minimization** – data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy** – data must be accurate and, where necessary, kept up to date.
- **Storage limitation** – data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and confidentiality** – data must be 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 by using appropriate technical or organisational measures.

4.2 This Policy describes the personal data that we collect and explains how we comply with these principles.

## 5. INFORMATION WE COLLECT

5.1 We collect the personal data as necessary to enable us to carry out your instructions, to manage and operate our business and to comply with our legal and regulatory obligations.

5.2 The personal data that we may collect will depend on why you have instructed us, and may comprise the following:

<b>Contact data</b>	Your name, home and business address, telephone numbers and email address.
<b>Identity data</b>	Information to enable us to check and verify your identity including your date of birth, copies of passport, national identity card, driving licence, utility bills, bank statements and similar documents.
<b>Financial data</b>	Information to enable us to undertake a credit or other financial checks on you; financial details so far as relevant to your instructions (e.g. the source of your funds if you are instructing on a purchase transaction); your bank and/or building society details.
<b>Matter data</b>	Information relating to the matter in which you are seeking our advice or representation, including personal data contained in emails, correspondence and other documents which you may provide to us; data relating to criminal convictions and offences.
<b>Biographical data</b>	Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information (e.g. if you instruct us on an immigration matter); details of your spouse/partner and dependants or other family members.  In limited circumstances and where relevant to your instructions, this may also include special category personal data, such as information about your racial or ethnic origin, gender, sexual orientation or religious or similar beliefs (for example, if you instruct us on a discrimination or employment-related matter).

<b>Professional data</b>	your employment status and details including salary and benefits and pension arrangements; your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances, (e.g. if you instruct us on matter related to your employment).
<b>Technical data</b>	information we obtain from our IT and communications monitoring; information from cookies on our website and similar tracking technologies used in our marketing emails; information from building access controls.
<b>Third party sourced data</b>	information from Companies House; information from your professional online presence (e.g. website, LinkedIn profile).

5.3 We collect and use this personal data to provide legal services. If you do not provide any personal data that we ask for and that we need to enable us to carry out your instructions, it may delay or prevent us from providing our services to you.

5.4 Where the personal data relates to your directors, shareholders, beneficial owners, employees, agents, associates, family members or other individuals that you deal with or have personal data about, you confirm that your provision of this personal data to us is lawful under data protection laws and that you have provided any required information or notices to those individuals. This does not affect our own obligations as a data controller under applicable law.

## 6. HOW YOUR INFORMATION IS COLLECTED

6.1 We collect most of this information from you directly. However, we also collect information:

6.1.1 from publicly accessible sources, (for example, Companies House);

6.1.2 directly from a third party (for example, client due diligence providers or credit reference agencies);

6.1.3 from a third party with your consent (for example, your bank or building society, another financial institution or advisor; or consultants and other professionals you may engage);

6.1.4 from your employer, professional body or pension administrators;

6.1.5 via our website - we use cookies on our website and similar tracking devices in our marketing emails (for more information on our use of cookies and similar tracking devices, please see our [cookie policy](#));

6.1.6 via our information technology systems, including our case management, document management and time recording systems, building access control systems and reception logs.

## 7. HOW AND WHY WE USE YOUR INFORMATION

7.1 Our use of your personal data is subject to your instructions, data protection laws and our professional duty of confidentiality.

- 7.2 We will only process your personal data if we have a legal basis for doing so, including where:
- 7.2.1 processing is necessary for the performance of our contractual engagement with you: this relates to all personal data we reasonably need to process to carry out your instructions;
  - 7.2.2 processing is necessary for compliance with a legal obligation to which we are subject: this relates to our legal obligations in relation to, for example, anti-money laundering; and
  - 7.2.3 processing is necessary for the purposes of the legitimate interests pursued by us, our client or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms. This may include processing for marketing, management, accounting, administration and data security purposes.

The table below further explains the purposes for which FW will use your personal data (excluding special categories of personal data) and our legal basis for doing so:

Type of information	Purposes for which we will process the information	Legal basis for the processing
Contact data Identity data Financial data Matter data Biographical data Professional data Technical data Third party sourced data	To provide legal professional services to you in connection with your matters	For the performance of our contract with you or to take steps at your request before entering into a contract
Contact data Identity data Financial data Matter data Biographical data Professional data Technical data Third party sourced data	To carry out associated administration, record keeping and accounting in connection with your matters and other processing necessary to comply with our professional, legal and regulatory obligations	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations
Contact data Identity data Financial data	Conducting checks to identify our clients and verify their identity  To comply with our anti-money laundering requirements	To comply with our legal and regulatory obligations
Contact data Identity data Financial data Matter data	To comply with our internal business policies	It is in our legitimate interests or those of a third party to adhere to our own internal procedures so that we can

Type of information	Purposes for which we will process the information	Legal basis for the processing
Biographical data Professional data Technical data Third party sourced data	For operational reasons, such as improving efficiency, training and quality control	deliver an efficient service to you. We consider this use to be necessary for our legitimate interests and proportionate
Contact data Identity data Financial data Matter data Biographical data Professional data Technical data Third party sourced data	To address any complaints or claims  To enforce legal rights or defend or undertake legal proceedings	For our legitimate interests (i.e. to protect our business, interests and rights)  Where necessary for the establishment, exercise or defence of legal claims
Contact data Technical data	Protecting the security of our systems and data used to provide services  To prevent unauthorised access and modifications to our systems	It is in our legitimate interests to prevent and detect criminal activity that could be damaging for Fox Williams and for you  To comply with our legal and regulatory obligations
Contact data Professional data Technical data Third party sourced data	For marketing our services	It is in our legitimate interests to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you  In some cases, we may rely on your consent (e.g. for the use of non-essential cookies or similar tracking technologies)
Contact data Identity data Financial data	To carry out credit reference checks	It is in our legitimate interests to carry out credit control and to ensure our clients are likely to be able to pay for our services
Contact data Matter data	External audits and quality checks (e.g. for our Investors in People accreditation and the audit of our accounts)	It is in our legitimate interests to maintain our accreditations so we can demonstrate we operate at the highest standards  To comply with our legal and regulatory obligations

- 7.3 Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests. If you want further information on the balancing test we have carried out, you can request this from our Privacy Manager.
- 7.4 Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal.
- 7.5 FW 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 in a timely manner (unless otherwise required by applicable law) and we will explain the legal basis which allows us to do so.

## **8. KEEPING YOUR INFORMATION UP TO DATE**

- 8.1 To help us ensure that your information is up to date, please let us know if any of your personal details change. You can update your details by contacting our Privacy Manager as provided in “Contacting us” above.

## **9. DATA PROCESSING**

- 9.1 In most cases, FW acts as a controller in relation to the processing of personal data as set in this Policy. However, in some circumstances we may process personal data on our client’s behalf as a processor for the purposes of data protection laws. Where we process any personal data on your behalf as your processor, the terms set out in our data processing addendum, a copy of which is available on request from our Privacy Manager, shall apply.

## **10. SPECIAL CATEGORIES OF PERSONAL DATA**

- 10.1 Some of the personal data which you provide to us, or which we may receive, will be special categories of personal data. This is defined by data protection laws to include personal data revealing a person’s racial or ethnic origin, religious or philosophical beliefs, or data concerning health. We process these special categories of personal data on the basis of one or more of the following:
  - 10.1.1 where you have given explicit consent to the processing of the personal data for one or more specified purposes;
  - 10.1.2 where the processing is necessary for the establishment, exercise or defence of legal claims;
  - 10.1.3 where the processing is necessary for reasons of substantial public interest, in accordance with applicable law.

## **11. DATA RELATING TO CRIMINAL CONVICTIONS & OFFENCES**

- 11.1 We collect and store personal data relating to criminal convictions and offences only where this is necessary and permitted by law, including for the purposes of:
  - 11.1.1 the prevention or detection of an unlawful act and where necessary for reasons of substantial public interest;

11.1.2 providing or obtaining legal advice; or

11.1.3 establishing, exercising or defending legal rights.

## **12. MARKETING**

12.1 We use your personal data to notify you by email, telephone, post or SMS about important legal developments and services which we think you may find valuable, by sending you newsletters, invitations to seminars and similar marketing.

12.2 We do not normally need your consent to send you marketing information about our services where this is permitted by law and based on our legitimate interests. However, in some cases we may rely on your consent (for example, in relation to non-essential cookies or similar tracking technologies).

12.3 You have the right to opt out of receiving direct marketing communications from us at any time by contacting our Privacy Manager using the contact details set out above; or using the “unsubscribe” link in emails.

## **13. EMAIL MONITORING**

13.1 Email which you send to us or which we send to you may be monitored by Fox Williams for legitimate purposes, including to ensure compliance with professional standards and our internal compliance policies. Monitoring is not continuous or routine and will only be undertaken where there are reasonable grounds for doing so and in a proportionate manner.

## **14. THIRD PARTY PROCESSORS**

14.1 Our information technology systems are operated by Fox Williams but some data processing is carried out on our behalf by a third party (see below **Disclosure of Personal data**). Details regarding these third party processors can be obtained from our Privacy Manager whose details are given above.

14.2 Where processing of personal data is carried out by a third party processor on our behalf, we endeavour to ensure that the processor provides sufficient guarantees to implement appropriate technical and organisational measures so that processing will meet the requirements of data protection laws.

## **15. DISCLOSURE OF PERSONAL DATA**

15.1 Personal data will be retained by us and may be shared, transferred or otherwise disclosed only as set out in this Policy and where we have a lawful basis to do so.

15.2 If we are working with other parties and professional advisers in relation to any matter handled by us on your behalf then, unless you instruct us otherwise, we shall assume that we may disclose your information to them.

We disclose and share personal data:

15.2.1 with FW partners, staff and consultants;

15.2.2 to other professional advisers acting on your behalf such as counsel, lawyers in another jurisdiction, your accountant, surveyor or financial adviser;

15.2.3 to our professional indemnity insurers or brokers, and our auditors, or risk managers who we or they may appoint;

- 15.2.4 third party processors, service providers, representatives and agents that we use to make our business more efficient, including for our IT services, data storage/back-up and marketing;
- 15.2.5 if we, acting in good faith, consider disclosure to be required by law or the rules of any applicable governmental, regulatory or professional body.
- 15.3 Certain laws (for example, those relating to anti-money laundering and tax fraud) give power to authorities such as the police or the tax authorities to inspect clients' information and take copies of documents. It is possible that, at any time, we may be requested by those authorities to provide them with access to your information in connection with the work we have done for you. If this happens, we will comply with the request only to the extent that we are bound by law and, in so far as it is allowed, we will notify you of the request or provision of information.
- 15.4 In certain circumstances, solicitors are required by statute to make a disclosure to the National Crime Agency where they know or suspect that a transaction may involve a crime including money laundering, drug trafficking or terrorist financing. If we make a disclosure in relation to your matter, we may not be able to tell you that a disclosure has been made.
- 15.5 We may transfer personal data to a successor firm or company which acquires the legal practice carried on by us. If this happens, we shall ensure that you are notified of the transfer and we shall secure a commitment from the firm or company to which we transfer personal data to comply with applicable data protection laws.
- 16. INTERNATIONAL TRANSFERS**
- 16.1 To deliver services to you, it is sometimes necessary for us to transfer and store your personal data outside the UK or the European Economic Area ("EEA") as follows:
  - 16.1.1 with our service providers located outside the UK or the EEA;
  - 16.1.2 if you are based outside the UK or the EEA;
  - 16.1.3 where there is an international aspect to the matter on which we have been instructed.
- 16.2 Where personal data is transferred to and stored outside the UK or the EEA, we take steps to provide appropriate safeguards to protect your personal data, including:
  - 16.2.1 transferring your personal data to a country, territory, sector or international organisation which the UK Government has determined ensures an adequate level of protection, as permitted under UK GDPR;
  - 16.2.2 entering into an international data transfer agreement in a form approved by the UK Government, obliging recipients to protect your personal data as permitted under UK GDPR;
  - 16.2.3 in the absence of an adequacy decision or of appropriate safeguards as referenced above, we will only transfer personal data to a third country where permitted under UK GDPR, including where the transfer is necessary for the establishment, exercise or defence of legal claims.

16.3 If you want further information on the specific mechanism used by us when transferring your personal data out of the UK or the EEA, please contact our Privacy Manager using the details set out above.

## 17. SECURITY OF YOUR INFORMATION

17.1 We use industry standard technical and organisational measures to protect information from the point of collection to the point of destruction.

17.2 Unfortunately, the transmission of information via the internet (including unencrypted email) is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet.

## 18. HOW LONG WE KEEP YOUR INFORMATION

18.1 Personal data received by us will only be retained for as long as necessary to fulfil our engagement. Following the end of our engagement we will retain your information:

18.1.1 to enable us to respond to any queries, complaints or claims made by you or on your behalf; and

18.1.2 to the extent permitted for legal, regulatory, fraud and other financial crime prevention and legitimate business purposes.

18.2 After this period, when it is no longer necessary to retain your personal data, we will securely delete or anonymise it in accordance with our Data Retention Policy. Further details regarding our data retention policy can be obtained from our Privacy Manager whose details are given above.

## 19. YOUR RIGHTS

19.1 You have various rights in relation to your personal data. In particular, you have the following rights:

**Access to your information (also known as a “data subject access request”)** You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal data which we are processing.

We may refuse to comply with a subject access request, in whole or in part, where the request is manifestly unfounded or excessive, or where an exemption applies under applicable law, including where the information is subject to legal professional privilege or a duty of confidentiality owed to another person.

**Rectification** You have the right to have inaccurate personal data rectified, or completed if it is incomplete. We may refuse to comply with a request for rectification if the request is manifestly unfounded or excessive or repetitive.

**Erasure** (also known as the right to be forgotten) In certain circumstances, you have the right to request the erasure of your personal data.

**Restriction** In certain circumstances, you have the right to restrict the processing of your personal data.

**Data portability** In certain circumstances, you have the right to receive your personal data in a structured and commonly used format so that it can be transferred to another controller.

**Right to object** You have the right to object at any time to our processing of your personal data for direct marketing purposes.

You also have the right to object, on grounds relating to your particular situation, to processing of your personal data which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

19.2 Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.

## **20. EXERCISING YOUR RIGHTS**

20.1 You can exercise any of your rights as described in this Policy and under data protection laws by contacting our Privacy Manager.

20.2 Save as described in this Policy or provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

20.3 Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

## **21. COMPLAINTS**

21.1 If you have concerns about how we are processing your personal data, you can contact the partner you usually deal with at Fox Williams, or our Privacy Manager using the contact details set out above.

21.2 We ask that you please attempt to resolve any issues with us first, although you also have the right to make a complaint to the Information Commissioner's Office who can be contacted at <https://ico.org.uk> or by telephone on 0303 123 1113.

## **22. CHANGES TO THIS POLICY**

- 22.1 We may change this Policy from time to time. The current version of this Policy will be made available on our website and can also be provided in hard copy on request.
- 22.2 When we make changes to this Policy, we will amend the revision date at the top of this page. The modified Policy will apply from that date.

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