



## Privacy policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

### 2. How we use your personal data

- 2.1 In this Section we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 2.2 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 2.3 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper

administration of our website and business and communications with you.

- 2.4 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.5 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to our insurers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 3.2 We may disclose your personal data to our panel of experts insofar as reasonably necessary for the purposes of acting on your instructions for the matter.

### **4. Retaining and deleting personal data**

- 4.1 This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **5. Amendments**

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

5.3 We may notify you of changes to this policy [by email or through the private messaging system on our website].

## **6. Your rights**

6.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

6.2 We may withhold personal information that you request to the extent permitted by law.

6.3 You may instruct us at any time not to process your personal information for marketing purposes.

6.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

6.5 You may instruct us to delete the personal information we hold about you. However there may be times where we cannot delete all the records due to our professional obligations and other laws to store such data, in which case we may anonymise the data so it does not identify you personally or for it to be locked down so only certain members of staff can access it but will not undertake any processing activities of such data.

## **7. About cookies**

7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

7.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

7.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **8. Cookies that we use**

8.1 We use cookies for the following purposes:

- (a) authentication - we use cookies [to identify you when you visit our website and as you navigate our website;
- (b) status - we use cookies to help us to determine if you are logged into our website;
- (c) personalisation - we use cookies to store information about your preferences and to personalise the website for you;
- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (f) analysis - we use cookies to help us to analyse the use and performance of our website and services; and

## **9. Managing cookies**

9.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

9.2 Blocking all cookies will have a negative impact upon the usability of many websites.

9.3 If you block cookies, you will not be able to use all the features on our website.

## **10. Our details**

10.1 This website is owned and operated by Solomon Levy and Co.

10.2 We are registered in England and Wales under registration number 55585, and our registered office is at 33 Alma Street Luton LU1 2PL.

10.3 Our principal place of business is at 33 Alma Street Luton LU1 2PL.

10.4 You can contact us:

- (a) by post, using the postal address given above;
- (b) by telephone, on the contact number published on our website from time to time; or
- (c) by email, using the email address published on our website from time to time.

## **11. Data protection officer**

11.1 Our data protection officer's contact details are: Jeff Solomon who can be contacted on 01582 425817 or whose email is [jeff@solomonlevy.com](mailto:jeff@solomonlevy.com)