

## **Privacy Notice**

Keating Chambers is committed to managing your data inline with the principles of GDPR. One of the key principles of GDPR is transparency regarding the data we process, how we process it and for what purpose.

Please read the following information carefully. This privacy notice contains information about the information collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who Chambers shares this information with, the security mechanisms Chambers has put in place to protect your information and how to contact Chambers in the event you need further information.

### **Who are we?**

Keating Chambers (*Keating Chambers Service Company Limited* – a company registered in England and Wales, company number 05161157 – ‘Keating Chambers’, ‘Chambers’) collects, uses and is responsible for personal information about you. When Chambers does this it is the ‘controller’ of this information for the purposes of the GDPR and the Data Protection Act 2018 (Data Protection Legislation).

Keating Chambers also acts as a data processor for Barristers at Chambers and will often process any data relating to an instruction with Barristers at Chambers under their instruction.

Keating Chambers have appointed a data protection manager to oversee all aspects of data governance at the organisations. If you need to contact Keating Chambers about your information or the processing carried out you can use the contact details at the end of this document.

### **What Information does Chambers collect?**

Chambers may collect the following personal information about you:

- Your name, date of birth and contact details (including your address, email and phone numbers);
- Personal Information contained in any instructions relating to a matter;
- Identification documents such as driving license, passport, photo ID, utility statements and bank statements;
- Financial information such as your bank details and any information about your financial status that you give us;
- Details of goods and services relevant to Chambers;
- Personal information given to us as an employer, or in the course of entering into employment, such as your CV, application forms, answers to any tests or assessments, education, training, references, employment history and information given in interview and meetings we may have with you;
- Information relating to pupillage applications and training positions at Chambers;
- Any personal details included in an instruction the Chambers is involved in (such as your contact details in emails);
- Information about any legal agreements you have entered into that may involve you and other individuals also included in the agreement;
- Information relating to events such as any access or dietary requirements;

- CCTV images from our CCTV systems at our offices;
- Signatures on any documents that you have signed at Chambers.

### **Special categories of personal data**

We may collect special categories of personal data including:

- Health information
- Racial or ethnic origin
- Political opinions
- Religious, philosophical or other beliefs
- Trade union membership
- Sex life or sexual orientation

Under Data Protection Legislation when this information is provided we will have a distinct legal basis for processing that may include your explicit consent. These categories of information are considered sensitive and we will be putting in place additional controls and measures to safeguard your data.

### **Information collected from other sources**

The same categories of information may also be obtained from third parties, such as members of Chambers, experts, members of the public, your family and friends, witnesses, courts and other tribunals, suppliers of goods and services, investigators, government departments, regulators, other legal service providers, other professional advisers, recruiters, professional networking sites, referees, public records and registers.

Keating Chambers acts as a data processor to Barristers at the Chambers and will process data under their instruction in the capacity as a data processor. Any processing of your data in this way is done under agreements with Barristers that incorporate the principles of GDPR and the Data Protection 2018.

### **How Chambers uses your personal information: Purposes**

Chambers may use your personal information for the following purposes:

- to promote and market the services of the Barristers;
- to train pupils (trainee Barristers) and staff;
- to recruit staff and pupils (trainee Barristers);
- to assess membership of prospective Barristers;
- to assess applications for and provide: tenancy, pupillage, mini-pupillage and work-shadowing opportunities;
- to provide work experience
- to fulfil regulatory requirements;
- to procure goods and services;
- to respond to requests for references;
- to publish legal judgments and decisions of courts and tribunals;
- to respond to potential complaints or make complaints;
- to carry out anti-money laundering and terrorist financing checks;
- to safeguard the premises and staff at Chambers;

- to host events and functions;
- as otherwise required or permitted by law.

### **Whether information has to be provided by you, and why**

We may require information from you to comply with legislative requirements including anti-money laundering and terrorist financing checks.

### **The legal basis for processing your personal information**

#### Consent

We may, with your consent, send you our newsletter.

We will process your data with your consent when you apply for positions at Chambers, including job applications, tenancy applications and pupillage applications. Please be aware if you withdraw consent in these circumstances we will be unable to continue to process your application.

Any other purpose where we have asked you for your consent that you have given us.

If we are processing special categories of data and relying on your explicit consent to do so.

We will rely on your consent when sharing limited information about you or your matter with legal directories.

You always have the right to withdraw your consent at any time. If you wish to withdraw your consent then please contact us using the information detailed below ('Contact Details').

#### Legal Obligation

Chambers is required to process information required to meet our legal obligations including record keeping, administration and regulatory activities (such as anti-money laundering and terrorist financing checks).

Employment related legal obligations.

Investigating, resolving and managing any expressions of dissatisfaction, claims or complaints in line with our obligations to Barristers and the BSB.

#### Legal Contract

Activities relating to a legal contract for goods and services either provided by or to Chambers.

Activities relating to the performance of an employment contract.

#### Public Interest

The processing is necessary to prevent or detect unlawful acts where it is in the substantial public interest and it must be carried out without consent so as not to prejudice those purposes.

### Legitimate Interest

We will rely on legitimate interest when inviting you to certain events and hospitality functions or when sending you Chambers publication or announcements. Our legitimate interest is the development of the Chambers professional network, and the benefit of our professional and client contacts.

We will rely on legitimate interest for any activities relating to the collection of debt. Our legitimate interest in these cases is the collection of outstanding monies.

### **Who will Chambers share your personal information with?**

It may be necessary to share your information with the following:

- IT providers;
- Search agencies;
- Software and storage providers;
- Professional advisers and consultants engaged in the course of running Chambers;
- Regulatory bodies including the Bar Standards Board and the Legal Ombudsman;
- Recruitment agencies;
- Other Chambers;
- Examining bodies and education authorities;
- Experts and other witnesses;
- Prosecution authorities;
- Courts and tribunals;
- Members of Chambers including Barristers and trainee Barristers;
- Advisers and other parties involved in any matter you discuss with us, or engage a member of Chambers to act on, such as professional clients, lay clients and professional clients;
- Family and associates of the person whose personal information Chambers is processing;
- Business associates, professional advisers and trade bodies, e.g. the Bar Council;
- The intended recipient, where you have asked Chambers to provide a reference;
- The general public in relation to the publication of legal judgments and decisions of courts and tribunals.

Chambers may be required to provide your information to regulators, such as the Bar Standards Board, the Financial Conduct Authority or the Information Commissioner's Office. In the case of the Information Commissioner's Office, there is a risk that your information may lawfully be disclosed by them for the purpose of any other civil or criminal proceedings, without Chambers' consent or your consent, which includes privileged information.

Chambers may also be required to disclose your information to the police or intelligence services, where required or permitted by law.

### **Transfer of your information outside the European Economic Area (EEA)**

It may be necessary to transfer your personal information outside the EEA or to an international organisation in order to fulfil my legal obligations. With the exception of cases where the nature of the case expressly or implicitly requires such transfer in any event (for example, because a case

involves clients or solicitors in Africa or Asia), if I do transfer data outside the EEA, I will notify you of the reasons, the legal basis for doing so, any relevant risk assessments that I want to make you aware of, and the safeguards in place to protect your rights and freedoms.

If Chambers decides to publish a judgment or other decision of a Court or Tribunal containing your information then it may be published to the world.

Chambers will not transfer personal information outside the EEA except as necessary for the conduct of any legal or arbitration proceedings or any other legal or dispute resolution services which our barristers are instructed to provide.

If you would like any further information please use the contact details at the end of this document.

### **How long will Chambers store your personal information?**

Chambers will normally store all your information:

Until at least 1 year after the expiry of any relevant limitation period, from for example the date on which your employment terminates, the date of the last provision of service or goods, the date of the last payment made or received or the date on which all outstanding payments are written off, whichever is the latest. This is because it may be needed for potential legal proceedings and we are required to keep relevant documents to comply with our obligations to our Indemnity Insurer.

At this point any further retention will be reviewed and the information will be marked for deletion or marked for retention for a further period. The latter retention period is likely to occur only where the information is needed for legal proceedings, regulatory matters or active complaints. Deletion will be carried out as soon as reasonably practicable after the information is marked for deletion.

Case information and work product may be used for reference and as precedent after the retention period.

Equality and diversity data may be retained for 2 years in pseudonymised form for the purpose of research and statistics and complying with regulatory obligations in relation to the reporting of equality and diversity data.

Names and contact details held for marketing purposes will be stored indefinitely or until Chambers becomes aware or is informed that the individual has ceased to be a potential client.

Personal information held for recruitment purposes or in relation to pupillage or mini-pupillage will be stored for 1 year longer than any relevant limitation date (usually 1 year from the end of the contract).

### **Your Rights**

Under the GDPR, you have a number of rights that you can exercise in certain circumstances. These are free of charge. In summary, you may have the right to:

- Ask for access to your personal information and other supplementary information;

- Ask for correction of mistakes in your information or to complete missing information Chambers holds on you;
- Ask for your personal information to be erased, in certain circumstances;
- Receive a copy of the personal information you have provided or have this information sent to a third party. This will be provided to you or the third party in a structured, commonly used and machine-readable format, e.g. a Word file;
- Object at any time to processing of your personal information for direct marketing;
- Object in certain other situations to the continued processing of your personal information;
- Restrict the processing of your personal information in certain circumstances;
- [Request not to be the subject to automated decision-making which produces legal effects that concern you or affects you in a significant way].

If you want more information about your rights under the GDPR please see the Guidance from the Information Commissioners Office on [Individual's rights under the GDPR](#).

If you want to exercise any of these rights, please:

- Use the contact details at the end of this document;
- Chambers may need to ask you to provide other information so that you can be identified;
- Please provide a contact address so that you can be contacted to request further information to verify your identity;
- Provide proof of your identity and address;
- State the right or rights that you wish to exercise.

Chambers will respond to you within one month from when it receives your request.

### **How to make a complaint**

We hope that you are happy with the services provided. If you do have any concerns then please contact us (see 'contact details' below) and we will work with you to resolve any issues or complaints that arise.

The GDPR also gives you the right to lodge a complaint with the Information Commissioners' Office. The Information Commissioner's Office can be contacted at <http://ico.org.uk/concerns/>.

### **Security**

Chambers take information security seriously and want to outline the ways in which we protect your data:

- We conduct training for all of our staff on information security and our obligations on GDPR;
- We have in place policies and procedures regarding GDPR, The Data Protection Act 2018, Information Security and Information Management;
- Our IT systems are managed by industry experts at Exact Solutions, to ensure our environment is secure and available;
- Regular backups are taken to protect against data loss and destruction;
- Encryption on all devices that contain personal information;
- Physical access controls to the Chambers offices;
- Security software including anti-virus and anti-malware;

- Dual factor authentication on remote access;

### **Future Processing**

Chambers does not intend to process your personal information except for the reasons stated within this privacy notice. If this changes, this privacy notice will be amended and placed on the Chambers' website at [www.keatingchambers.com](http://www.keatingchambers.com)

### **Changes to this privacy notice**

This privacy notice was published on 23 May 2018 and will be reviewed at least annually.

Chambers regularly reviews its privacy practices and may change this policy from time to time. When it does an amended privacy notice will be placed on the Chambers' website at [www.keatingchambers.com](http://www.keatingchambers.com).

### **Contact Details**

If you have any questions about this privacy notice or the information Chambers holds about you, please contact the Chambers Data Protection Manager using the contact details below.

Email: [clerks@keatingchambers.com](mailto:clerks@keatingchambers.com)

Phone: +44 (0)20 7544 2600

Address: Keating Chambers, 15 Essex Street, London, WC2R 3AA

Web: [www.keatingchambers.com](http://www.keatingchambers.com)