# PRIVACY NOTICE

Thomson Snell & Passmore respects the privacy of your personal data. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

This privacy policy does not apply to any third party websites that may have links to our own website.

Our use of your personal data is subject to your instructions, the UK General Data Protection Regulation (GDPR), other relevant UK and EU legislation and our professional duty of confidentiality.

## 1. Key terms

| | |
|---|---|
| **We, us, our, Thomson Snell & Passmore** | Thomson Snell & Passmore LLP and Thomson Snell & Passmore Trust Corporation Limited |
| **Data protection manager** | Rebecca Ison, Head of Risk & Compliance<br><br>01892 701158<br><br>rebecca.ison@ts-p.co.uk |
| **Personal data** | Any information which can be used to identify a living individual |
| **Sensitive personal data** | Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership<br><br>Genetic and biometric data<br><br>Data concerning health, sex life or sexual orientation |

## 2. Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of advising or acting for you.

We may also collect information from you when you use our website, if you sign up to our newsletters, if you fill in a form on our website, if you send us your curriculum vitae, if you complete a feedback form or attend one of our events or seminars.

| **Personal data we will collect** |
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| Your name, address and telephone numbers;<br><br>Information to enable us to check and verify your identity;<br><br>Electronic contact details;<br><br>Information relating to the matter in which you are seeking our advice or representation; |

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| Information to enable us to undertake a credit or other checks, e.g. your date of birth and passport details;<br><br>Your financial details so far as relevant to your instructions, including source of funds where relevant. |

| **Personal data we may collect** |
|---|
| Your National Insurance and tax details;<br><br>Your bank and/or building society details;<br><br>Details of your professional online presence;<br><br>Details of your spouse/partner and dependants or other family members;<br><br>Your employment status and details including salary and benefits;<br><br>Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including sensitive personal data);<br><br>Details of your pension arrangements;<br><br>Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs;<br><br>Your trade union membership;<br><br>Personal identifying information, such as your hair or eye colour or your parents' names;<br><br>Your medical records;<br><br>Details prevalent to the matter upon which you are instructing us;<br><br>Information about births, deaths and marriages where applicable;<br><br>Various details of any financial assets relevant to your matter;<br><br>Your employment history, academic qualifications, awards, results and work experience. |

This personal data is required to enable us to provide our services to you and to manage any contact through our website. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

## 3. How your personal data is collected

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

- from publicly accessible sources, e.g.:
    - Companies House;
    - HM Land Registry;

- directly from a third party service provider, e.g.:
    - sanctions screening providers;
    - credit reference agencies;
    - client due diligence providers;
- from a third party with your consent, e.g.:
    - your bank or building society, another financial institution or advisor;
    - consultants and other professionals engaged in relation to your matter;
    - your employer or trade union, professional body or pension administrators;
    - your doctors, medical and occupational health professionals;
- via our website - we use Google Analytics and Google Signals to gather data for advertising and measurement. This involves collecting data from users who are signed into their Google accounts to provide them with personalised experiences across different devices and platforms. This data is aggregated and anonymised, ensuring that no individual user's personal information is exposed. We also use cookies on our website (for more information on our use of cookies, please access the cookie icon (bottom left) of our website: www.ts-p.co.uk);
- from a third party who has a legal duty to provide such information e.g.
    - an executor or a trustee providing details of beneficiaries;
- via our information technology (**IT**) systems, e.g.:
    - case management, document management and time recording systems;
    - reception logs; and
    - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, telecommunications systems, and email messaging systems.

## 4. How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

| **What we use your personal data for** | **Our reasons** |
|---|---|
| To discuss the provision of legal services. | To consider and/or to take steps at your request before entering into a contract. |
| To provide legal services to you. | For the performance of our contract with you or to take steps at your request before entering into a contract. |
| Conducting checks to identify our clients and verify their identity.<br><br>Screening for financial and other sanctions or embargoes.<br><br>Undertaking conflict checks.<br><br>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business. | To comply with our legal and regulatory obligations or for our legitimate interests. |
| Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies. | To comply with our legal and regulatory obligations. |
| Ensuring business policies are adhered to. | For our legitimate interests or those of a third party – to make sure we are following our internal procedures so that we can deliver the best service to you. |
| Operational reasons, such as improving efficiency, training and quality control. | For our legitimate interests or those of a third party – to ensure we are as efficient as possible in order to deliver the best service to you. |
| Ensuring the confidentiality of commercially sensitive information. | For our legitimate interests or those of a third party – to protect our intellectual property and other commercially valuable information.<br><br>To comply with our legal and regulatory obligations. |
| Statistical analysis to help us manage our practice. | For our legitimate interests or those of a third party - to ensure we are as efficient as possible in order to deliver the best service to you. |

| What we use your personal data for | Our reasons |
|---|---|
| Preventing unauthorised access and modifications to systems. | For our legitimate interests or those of a third party - to prevent and detect criminal activity that could be damaging to you or us.<br><br>To comply with our legal and regulatory obligations. |
| Updating and enhancing our records. | For the performance of our contract with you or to take steps at your request before entering into a contract.<br><br>To comply with our legal and regulatory obligations.<br><br>For our legitimate interests or those of a third party – to ensure we can keep in touch with our clients about new and existing services. |
| Statutory returns. | To comply with our legal and regulatory obligations. |
| Ensuring safe working practices, staff administration and assessments. | To comply with our legal and regulatory obligations.<br><br>For our legitimate interests or those of a third party – to ensure that we are following our internal procedures to work safely and efficiently. |
| Marketing our services to:<br><br>• existing and former clients;<br><br>• third parties who have previously expressed an interest in our services;<br><br>• third parties with whom we have had no previous dealings;<br><br>• third party service providers involved in services that are complimentary to legal services such as accountants, corporate financiers, independent financial advisors and financial services;<br><br>• alumni - staff who have worked for us and wish to stay in touch. | For our legitimate interests or those of a third party – to promote out business to existing, former and potential clients. |

| What we use your personal data for | Our reasons |
|---|---|
| Credit reference checks via external credit reference agencies and for managing our own credit control and debt recovery. | For our legitimate interests or those of a third party – for credit control and in order to verify the identity of our clients, potential clients and sometimes people related to them.<br><br>To comply with our legal and regulatory obligations. |
| External audits and quality checks, e.g. for Lexcel, Law Society, Chambers, The Legal 500 accreditation and the audit of our accounts. | For our legitimate interests or those of a third party – to maintain accreditations to demonstrate the high quality of our work and service.<br><br>To comply with our legal and regulatory obligations. |
| Insurance-related matters<br><br>We will share information with our brokers, insurers and other third parties who may be involved. | For our legitimate interests or those of a third party – to maintain appropriate insurance coverage as a professional firm and to report any potential claim as required under our policies.<br><br>For the performance of our obligations under our contracts of insurance and for the establishment, exercise or defence of legal rights or claims.<br><br>To comply with our legal and regulatory obligations. |
| To respond to any complaints we may receive from you or a third party. | To comply with our legal and regulatory obligations. |
| To consider and respond to any enquiries or chat submitted through our website. | For our legitimate interests or those of a third party. |
| To consider and respond to any applications for jobs submitted through our website. | For our legitimate interests or those of a third party. |
| To enforce legal rights or defend or undertake legal proceedings. | Depending on the circumstances to comply with our legal and regulatory obligations or for our legitimate interests to protect our business, interests and rights. |

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of your personal data you have provided to us has changed.

The above table does not apply to sensitive personal data, which we will only process with your explicit consent, unless one of the exceptions to explicit consent under Article 9 of the UK GDPR applies. They include:

- Processing which is necessary for the establishment, exercise or defence of legal claims.

- Processing which is necessary to protect the vital interests of a natural person who is physically or legally unable to give consent.

- Processing is necessary for reasons of substantial public interest.

## 5. Electronic identification and Credit Reference Agencies

To assist us in identity verification and document validation we have engaged with a third-party provider called First AML. For data verification purposes your personal details will be electronically checked against particulars on several databases provided by their data partners, that include, Comply, Advantage, Equifax and Onfido.

## 6. Promotional communications

We may use your personal data to send you updates (by email, text message, telephone, post or social media) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal data for promotional purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, for example for electronic marketing communications regarding our broader legal services, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us on info@ts-p.co.uk; or

- using the 'unsubscribe' link in emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

## 7. Who we share your personal data with

We routinely share personal data with:

- professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors, foreign law firms or other experts;

- other people involved in your matter (including the other side) and their advisers;

- other third parties where necessary to carry out your instructions, e.g. your mortgage provider, HM Land Registry or Companies House;

- credit reference agencies;

- our insurers and brokers;

- external auditors, external legal and financial advisors e.g. in relation to Lexcel accreditation and the audit of our accounts;
- our bank;
- our suppliers, business partners and sub contractors including IT providers;
- government authorities and law enforcement officials where necessary;
- other third parties we use to help promote our business for example marketing agencies;
- third parties who assist us in collating feedback and legal ranking services for example Legal 500; and
- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. typing and other office services suppliers, including telephone receptionists, postal services, public relations agencies and our live chat provider.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## 8. Our use of new and novel technologies

We strive to be at the forefront of innovation, both when providing legal services to our clients, as well as ensuring that our processes are as efficient and cost-effective as possible. To this end, we may occasionally adopt new technology tools. Such tools may leverage artificial intelligence or cloud-based technologies owned by third parties.

New technology tools may be used for the following purposes:

- to automate repetitive tasks;
- to assist with our anti-money laundering (AML) and know your client (KYC) procedures;
- to help manage emails, meetings and tasks;
- to assist with reviews of large volumes of documents;
- to generate machine translations; and
- to develop, test and train the tools themselves.

Prior to the adoption of any tool which takes advantage of artificial intelligence or cloud-based functionality, we conduct an extensive due diligence process in line with industry best practice, including with reference to our internal data privacy policies and security certifications. This ensures that confidentiality, security and the transparent, ethical use of new technologies are always prioritised. Where such tools are used as part of the provision of legal services to our clients, any outputs they generate will be vetted by appropriately qualified and experienced members of staff. Where necessary, we will seek client consent for the use of any tool which is used for client work outside of our normal business operations.

## 9. Recording and transcription of video meeting

We may record and/or transcribe video meetings using Microsoft Teams and/or Microsoft 365 Copilot, for example to assist with preparing meeting notes, minutes, summaries, and agreed actions.

Before recording or transcription begins, we will explain to attendees which activities are proposed and their purpose and obtain every attendee's agreement to each activity. We will only proceed if every attendee agrees.

Where attendees agree to a video recording but do not wish their image to be recorded, they may turn their camera off and continue to participate in the meeting.

Transcription alone may be proposed as an alternative to video recording, subject to the agreement of all attendees.

Once the agreed recording or transcription has started, we will confirm for the benefit of the recording that all attendees have agreed to that activity. Recordings, transcripts, and material generated from them will be handled securely and in accordance with our data protection, confidentiality, information governance, and retention requirements.

## 10. Careers

If you choose to apply for a job at this firm by submitting an application online through our website we will collect and hold the information you provide in that application and from any interviews that may take place for a year. We will only use the information you provide to us for the sole purpose of considering your application for employment with this firm. If your application is successful then any personal data will be transferred to your personnel file.

## 11. Where your personal data is held

Information may be held at our offices and those premises of our IT service providers and the third party agencies, service providers, representatives and agents as described above (see '**Who we share your personal data with**').

Our IT service providers may utilise cloud platforms, which distribute personal data across multiple places for the purposes of efficiency, business resilience, cyber security and risk management.

Some of these third parties and IT service providers may be based or have premises outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the UK and EEA**'.

## 12. How long your personal data will be kept

We will keep your personal data after we have finished advising or acting for you and also following any enquiry about the use of our legal services. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to enable us to carry out checks for conflicts of interest in the future;
- to show that we treated you fairly;
- to prevent fraud;
- to enforce our terms and conditions; and
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy.

Different retention periods apply for different types of data. When we complete advising you on a particular matter, we will inform you of how long we will retain your data for or you can ask us at any time for our current retention period that applies to your type of matter. We will retain a digital record of having acted for you for as long as is necessary to carry out checks for conflicts of interest in accordance with our professional regulations.

## 13. Transferring your personal data out of the UK and EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the UK and / or the European Economic Area (**EEA**), e.g.:

- with your service providers located outside the UK/EEA;
- if you are based outside the UK/EEA; or
- where there is an international dimension to the matter in which we are advising you; or
- Where third party providers are based or have premises outside the UK/EEA.

We will transfer your personal data outside the UK/EEA only where:

- the UK government, or European Commission, has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy decision); or
- there are appropriate safeguards in place e.g. standard contractual data protection clauses published or approved by the data protection regulator, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under data protection law.

If you would like further information please contact our data protection manager - please see below: ‘How to contact us’.

14. **Your rights**

You have the following rights, which you can exercise free of charge. To exercise your rights please contact us by email, telephone or write to us:

| | |
|---|---|
| **Access** | The right to be provided with a copy of your personal data. |
| **Rectification** | The right to require us to correct any mistakes in your personal data. |
| **To be forgotten** | The right to require us to delete your personal data in certain situations. |
| **Restriction of processing** | The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data. |
| **Data portability** | The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations. |
| **To object** | The right to object:<br>• at any time to your personal data being processed for direct marketing;<br>• in certain other situations to our continued processing of your personal data, for example processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of a legal claim. |
| **Not to be subject to automated individual decision making** | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. |
| **The right to withdraw consent** | If you have provided us with your consent to use your personal data you have a right to withdraw that consent easily at any time.<br>You may withdraw consent by advising the person you are in contact with at this firm or by emailing info@ts-p.co.uk<br>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.<br>Withdrawal of consent may affect the services we can and are providing to you. |

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the guidance from the UK Information Commission Office on

individuals' rights under the General Data Protection Regulation - https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/.

If you would like to exercise any of those rights, please:

- email, call or write to our data protection manager - see below: '**How to contact us**';
- let us have enough information to identify you (your full name, address and client or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

**No fee usually required**

- You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

- We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

- We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 15. Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

We regularly monitor our systems for vulnerabilities or attacks to ensure we can identify ways to further strengthen our security.

The firm is accredited with both Cyber Essentials Plus and Lexcel.

## 16. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union or EEA state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commission Office who may be contacted at https://ico.org.uk/concerns or telephone: 0303 123 1113.

## 17. Changes to this privacy policy

This privacy notice was published on 3 May 2018 and last updated September 2026. We will provide you with reasonable prior notice of substantial changes in how we use your information, including by email at the email address you provide.

## 18. How to contact us

Please contact us or our data protection manager by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

| **Our contact details** | **Data protection manager** |
|---|---|
| Thomson Snell & Passmore LLP<br>Heathervale House<br>2-4 Vale Avenue<br>Tunbridge Wells<br>Kent<br>TN1 1DJ<br><br>info@ts-p.co.uk<br><br>01892 510000 | Rebecca Ison<br>Head of Risk & Compliance<br><br>Thomson Snell & Passmore LLP<br>Heathervale House<br>2-4 Vale House<br>Tunbridge Wells<br>Kent<br>TN1 1DJ<br><br>rebecca.ison@ts-p.co.uk<br><br>01892 701158 |

If you would like this notice in another format (for example audio, large print, braille) please contact us on 01892 510000.