

# PRIVACY NOTICE

## GOUGH SQUARE CHAMBERS

Last updated: 23rd May 2018

### 1. INTRODUCTION

- 1.1. The purpose of this notice is to let you know about how we process and look after your personal information and the rights that you have under data protection law. This privacy notice sets out how Gough Square Chambers, as a data controller, collects, stores, shares, and uses personal data in accordance with the provisions of **Regulation (EU) 2016/679 (the General Data Protection Regulation, or GDPR)** and the **Data Protection Act 2018 (“DPA18”)**.
- 1.2. The barristers who practise from Chambers are all self-employed practitioners and in that capacity they are data controllers in their own right. Lay and professional clients are advised to review the individual privacy notices of any barristers whom they may instruct in addition to this one.
- 1.3. From time to time we may change this privacy notice. Where we do so, we will publish this on our website and draw attention to it when accepting any instructions.

### 2. WHO WE ARE

- 2.1. Gough Square Chambers (“Chambers”/“we”/“us”) is a barristers’ chambers located at **6-7 Gough Square, London, EC4A 3DE**. You can find out more about us at: **[www.goughsq.co.uk](http://www.goughsq.co.uk)**.

2.2. Chambers is registered with the Information Commissioner's Office (ICO) as a data controller, with the registration number **ZA028915**. Our registered address is **6-7 Gough Square, London, EC4A 3DE**.

2.3. If you have any questions about, or want more information about how we use your personal information, you can contact us by email on **gsc@goughsq.co.uk** or you can call us on **020 7353 0924**.

### 3. DATA TO WHICH THIS NOTICE APPLIES

#### 3.1. Personal Data

3.1.1. This may include your contact details, any description which you provide to us of the services required and any information relevant to your case.

#### 3.2. Special Categories of Personal Data

3.2.1. Certain types of data are designated as "special categories of personal data" for the purposes of the GDPR and DPA18, namely:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs,;
- trade union membership;
- genetic data;
- biometric data for the purpose of uniquely identifying a natural person;
- data concerning health;
- data concerning a natural person's sex life or sexual orientation.

#### 3.3. Data Relating to Criminal Convictions or Offences

3.3.1. There are specific requirements for processing data relating to criminal convictions or offences, and we will only process such data where and for the purposes allowed by the GDPR and DPA18. For the specific circumstances in which we will process these data and the grounds on which we rely to give us permission to do so, see section 7.

4. **OUR RIGHT TO PROCESS YOUR PERSONAL INFORMATION**

4.1. Chambers will process your personal information in order to administer Chambers and allow members of Chambers to provide legal services to their clients. However, we are only allowed to use your personal information if we have a proper reason to do so (this includes sharing your personal information outside of Gough Square Chambers).

5. **COLLECTING YOUR PERSONAL INFORMATION**

5.1. Chambers will collect personal information that you provide to us in the course of dealing with us (for example, instructing a barrister, entering into a contract to provide services for Chambers, or applying to Chambers for pupillage) including but not limited to information provided by email, telephone and in papers.

6. **STORING YOUR DATA**

6.1. Your data will be stored securely in Chambers Management System, which is provided by Advanced Legal Services Limited, and on the personal electronic devices of barristers and clerks.

7. **TYPES OF DATA HELD AND HOW THEY ARE PROCESSED**

7.1. **Lay Clients**

Lay clients data table
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Personal data held	<p>Personal data which it is foreseeable that Chambers are likely to obtain in the course of handling a client’s case include:</p> <ul style="list-style-type: none"> <li>• <b>Name</b></li> <li>• <b>Address</b></li> <li>• <b>Telephone number</b></li> <li>• <b>E-mail address</b></li> <li>• <b>Payment, bank, and other financial details</b></li> <li>• <b>Family details</b>, such as the names of any relatives or other information about them</li> <li>• <b>Lifestyle and social circumstances details</b></li> <li>• <b>Education, training and employment details</b></li> <li>• <b>Special categories of personal data.</b> This can include information about your health (including medical records), race or ethnic origin, political opinions, religious, philosophical or other beliefs, trade union membership, sex life or sexual orientation, genetic data, or biometric data.</li> <li>• Details about any <b>criminal convictions</b> that you may have, including DBS and/or PNC data.</li> </ul>
Purpose of processing	<ul style="list-style-type: none"> <li>• To enable the client’s case to be handled by the instructed barrister.</li> <li>• To handle complaints made about the service provided by chambers or an individual barrister.</li> <li>• For regulators purposes.</li> <li>• To carry out checks as required by money laundering legislation.</li> <li>• For accountancy and administrative purposes.</li> <li>• For the purpose of identifying potential conflicts of interest.</li> </ul>
Basis for processing personal data	<ul style="list-style-type: none"> <li>• Consent.</li> <li>• For the purposes of the fulfilment of a contract between the client and Chambers.</li> <li>• For compliance with legal obligations by which Chambers are bound.</li> <li>• Chambers’ legitimate interest in being able to provide legal advice and services.</li> <li>• The performance of tasks carried out in the public interest, namely the administration of justice, the purposes of legal proceedings and the provision of legal advice.</li> </ul>

Basis for processing special categories of personal data	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Purposes in which there is a substantial public interest, namely the administration of justice.</li> </ul>
Basis for processing data relating to criminal convictions and offences	<ul style="list-style-type: none"> <li>• Consent</li> <li>• The performance of tasks carried out in the public interest, namely the administration of justice, the purposes of legal proceedings and the provision of legal advice.</li> </ul>
How the data are obtained	<ul style="list-style-type: none"> <li>• Directly from the lay client</li> <li>• From solicitors</li> <li>• From referring bodies such as the Bar Pro Bono Unit, professional associations, or trades unions.</li> <li>• From other parties in the case.</li> <li>• From the public domain.</li> <li>• From the court or other tribunal.</li> </ul>
Persons with whom Chambers will share the data	<ul style="list-style-type: none"> <li>• Members of Chambers in order to enable them to work on the case.</li> <li>• Persons connected with the client's case, such as solicitors, barristers other than the instructed barrister, HMCTS staff, and/or the judge.</li> <li>• Pupils and mini-pupils working in Chambers.</li> <li>• Third-party service providers, such as Chambers' accountant, typist, and IT providers.</li> <li>• Other barristers and sets of chambers, for example where it is necessary for work to be returned or cover to be arranged for a hearing.</li> <li>• Public and regulatory bodies, such as HMRC, the Ministry of Justice, and the Bar Standards Board, in order to comply with legal and regulatory obligations by which Chambers are bound.</li> <li>• HMCTS, for the purposes of the administration of justice.</li> <li>• Persons involved in the event of a dispute between the client and Chambers, such as Chambers' legal advisers and any court or tribunal adjudicating the dispute.</li> </ul>
Retention period	<ul style="list-style-type: none"> <li>• Case names: indefinitely for conflict purposes.</li> <li>• Other personal data: seven years following the conclusion of the client's case.</li> </ul>

## 7.2. Non-Clients

<b>Non-clients data table</b>	
Personal data held	<p>Personal data which it is foreseeable that Chambers are likely to obtain about other people in the course of handling a client's case include:</p> <ul style="list-style-type: none"> <li>• <b>Name</b></li> <li>• <b>Address</b></li> <li>• <b>Telephone number</b></li> <li>• <b>E-mail address</b></li> <li>• <b>Payment, bank, and other financial details</b></li> <li>• <b>Family details</b>, such as the names of any relatives or other information about them</li> <li>• <b>Lifestyle and social circumstances details</b></li> <li>• <b>Education, training and employment details</b></li> <li>• <b>Special categories of personal data.</b> This can include information about your health (including medical records), race or ethnic origin, political opinions, religious, philosophical or other beliefs, trade union membership, sex life or sexual orientation, genetic data, or biometric data.</li> <li>• Details about any <b>criminal convictions</b> that you may have, including DBS and/or PNC data.</li> </ul>
Purpose of processing	<ul style="list-style-type: none"> <li>• To enable the client's case to be handled by the instructed barrister.</li> <li>• To handle complaints made about the service provided by chambers or an individual barrister.</li> <li>• For regulatory purposes.</li> <li>• To carry out checks as required by money laundering legislation.</li> <li>• For administrative purposes.</li> <li>• For the purpose of identifying potential conflicts of interest.</li> </ul>
Basis for processing personal data	<ul style="list-style-type: none"> <li>• For compliance with legal obligations by which Chambers are bound.</li> <li>• Chambers' legitimate interest in being able to provide legal advice and services.</li> <li>• The performance of tasks carried out in the public interest, namely the administration of justice, the purposes of legal proceedings and the provision of legal advice.</li> </ul>

Basis for processing special categories of personal data	<ul style="list-style-type: none"> <li>• Purposes in which there is a substantial public interest, namely the administration of justice.</li> </ul>
Basis for processing data relating to criminal convictions and offences	<ul style="list-style-type: none"> <li>• The performance of tasks carried out in the public interest, namely the administration of justice, the purposes of legal proceedings and the provision of legal advice.</li> </ul>
How the data are obtained	<ul style="list-style-type: none"> <li>• From the lay client</li> <li>• From solicitors</li> <li>• From referring bodies such as the Bar Pro Bono Unit, professional associations, or trades unions.</li> <li>• From other parties in the case.</li> <li>• From the public domain.</li> <li>• From the court or other tribunal.</li> </ul>
Persons with whom Chambers will share the data	<ul style="list-style-type: none"> <li>• Members of Chambers in order to enable them to work on the case.</li> <li>• Persons connected with the client's case, such as solicitors, barristers other than the instructed barrister, HMCTS staff, and/or the judge.</li> <li>• Pupils and mini-pupils working in Chambers.</li> <li>• Third-party service providers, such as Chambers' accountant, typist, and IT providers.</li> <li>• Other barristers and sets of chambers, for example where it is necessary for work to be returned or cover to be arranged for a hearing.</li> <li>• Public and regulatory bodies, such as HMRC, the Ministry of Justice, and the Bar Standards Board, in order to comply with legal and regulatory obligations by which Chambers are bound.</li> <li>• HMCTS, for the purposes of the administration of justice.</li> <li>• Persons involved in the event of a dispute between the client and Chambers, such as Chambers' legal advisers and any court or tribunal adjudicating the dispute.</li> </ul>
Retention period	<ul style="list-style-type: none"> <li>• Case names: indefinitely for conflict purposes.</li> <li>• Other personal data: seven years following the conclusion of the client's case.</li> </ul>

### 7.3. Professional clients (solicitors)

<b>Professional clients data table</b>	
Personal data held	<p>Personal data which it is foreseeable that Chambers are likely to obtain about other people in the course of handling a client's case include:</p> <ul style="list-style-type: none"> <li>• <b>Name</b></li> <li>• <b>Business address</b></li> <li>• <b>Telephone number</b></li> <li>• <b>E-mail address</b></li> <li>• <b>Education, training and employment details</b></li> </ul>
Purpose of processing	<ul style="list-style-type: none"> <li>• To enable the client's case to be handled by the instructed barrister.</li> <li>• To handle complaints made about the service provided by chambers or an individual barrister.</li> <li>• For regulatory purposes.</li> <li>• To carry out checks as required by money laundering legislation.</li> <li>• For administrative purposes.</li> <li>• For the purpose of identifying potential conflicts of interest.</li> <li>• For marketing purposes.</li> </ul>
Basis for processing personal data	<ul style="list-style-type: none"> <li>• Consent</li> <li>• For the purposes of the fulfilment of a contract between the professional client and Chambers.</li> <li>• For compliance with legal obligations by which Chambers are bound.</li> <li>• Chambers' legitimate interest in being able to provide legal advice and services.</li> </ul>
How the data are obtained	<ul style="list-style-type: none"> <li>• From the lay client</li> <li>• From solicitors</li> <li>• From referring bodies such as the Bar Pro Bono Unit, professional associations, or trades unions.</li> <li>• From other parties in the case.</li> <li>• From the public domain.</li> <li>• From the court or other tribunal.</li> </ul>

Persons with whom Chambers will share the data	<ul style="list-style-type: none"> <li>• Members of Chambers in order to enable them to work on the case.</li> <li>• Persons connected with the client’s case, such as solicitors, barristers other than the instructed barrister, HMCTS staff, and /or the judge.</li> <li>• Pupils and mini-pupils working in Chambers.</li> <li>• Third-party service providers, such as Chambers’ accountant, typist, and IT providers.</li> <li>• Other barristers and sets of chambers, for example where it is necessary for work to be returned or cover to be arranged for a hearing.</li> <li>• Public and regulatory bodies, such as HMRC, the Ministry of Justice, and the Bar Standards Board, in order to comply with legal and regulatory obligations by which Chambers are bound.</li> <li>• HMCTS, for the purposes of the administration of justice.</li> <li>• Persons involved in the event of a dispute between the client and Chambers, such as Chambers’ legal advisers and any court or tribunal adjudicating the dispute.</li> </ul>
Retention period	Chambers’ lifetime, subject to the removal of consent. In the event of removal of consent, data may still be retained on the basis of Chambers’ legitimate interests (e.g. payment of money owed to Chambers).

#### 7.4. Other professional contacts

<b>Other professional contacts data table</b>	
Personal data held	Personal data which it is foreseeable that Chambers are likely to obtain about other professional contacts (such as judges, former members of chambers, applicants for employment or pupillage, and solicitors otherwise than when they are instructing Chambers) include: <ul style="list-style-type: none"> <li>• <b>Name</b></li> <li>• <b>Business address</b></li> <li>• <b>Telephone number</b></li> <li>• <b>E-mail address</b></li> <li>• <b>Education, training and employment details</b></li> </ul>

Purpose of processing	<ul style="list-style-type: none"> <li>• To handle complaints made about the service provided by chambers or an individual barrister.</li> <li>• For regulatory purposes.</li> <li>• For administrative purposes.</li> <li>• For the purpose of identifying potential conflicts of interest.</li> <li>• For marketing purposes.</li> </ul>
Basis for processing personal data	<ul style="list-style-type: none"> <li>• Consent</li> <li>• For the purposes of the fulfilment of a contract between the contact and Chambers.</li> <li>• Chambers' legitimate interest in being able to provide legal advice and services.</li> </ul>
How the data are obtained	<ul style="list-style-type: none"> <li>• From the contact in question.</li> <li>• From common contacts.</li> <li>• From referring bodies such as the Bar Pro Bono Unit, professional associations, or trades unions.</li> <li>• From the public domain.</li> <li>• From a court or other tribunal.</li> </ul>
Persons with whom Chambers will share the data	<ul style="list-style-type: none"> <li>• Members of Chambers..</li> <li>• Pupils and mini-pupils working in Chambers.</li> <li>• Third-party service providers, such as Chambers' accountant and typist.</li> <li>• Public and regulatory bodies, such as HMRC, the Ministry of Justice, and the Bar Standards Board, in order to comply with legal and regulatory obligations by which Chambers are bound.</li> <li>• HMCTS, for the purposes of the administration of justice.</li> </ul>
Retention period	Chambers' lifetime, subject to the removal of consent. In the event of removal of consent, data may still be retained on the basis of Chambers' legitimate interests (e.g. payment of money owed to Chambers).

### 7.5. Clerks and other employees of Chambers

<b>Clerks and employees data table</b>
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Personal data held	<p>Personal data which it is foreseeable that Chambers are likely to obtain about other people in the course of handling a client's case include:</p> <ul style="list-style-type: none"> <li>• <b>Name</b></li> <li>• <b>Address</b></li> <li>• <b>Telephone number</b></li> <li>• <b>E-mail address</b></li> <li>• <b>Payment, bank, and other financial details</b></li> <li>• <b>Family details</b>, such as the names of any relatives or other information about them</li> <li>• <b>Lifestyle and social circumstances details</b></li> <li>• <b>Education, training and employment details</b></li> <li>• <b>Special categories of personal data.</b> This can include information about your health (including medical records), race or ethnic origin, political opinions, religious, philosophical or other beliefs, trade union membership, sex life or sexual orientation, genetic data, or biometric data.</li> <li>• Details about any <b>criminal convictions</b> that you may have, including DBS and/or PNC data.</li> </ul>
Purpose of processing	<ul style="list-style-type: none"> <li>• To enable Chambers to exercise its rights and comply with its obligations as an employer.</li> <li>• For accountancy and administrative purposes.</li> </ul>
Basis for processing personal data	<ul style="list-style-type: none"> <li>• Consent.</li> <li>• For the purposes of the fulfilment of a contract between the employee and Chambers.</li> <li>• For compliance with legal obligations by which Chambers are bound.</li> <li>• Chambers' legitimate interest in being able to administer Chambers.</li> </ul>
Basis for processing special categories of personal data	<ul style="list-style-type: none"> <li>• Consent</li> <li>• The processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment.</li> </ul>

Basis for processing data relating to criminal convictions and offences	<ul style="list-style-type: none"> <li>• Consent</li> <li>• The processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment.</li> </ul>
How the data are obtained	<ul style="list-style-type: none"> <li>• Directly from the employee.</li> <li>• From previous employers.</li> <li>• From recruitment agencies or similar organisations.</li> <li>• From referees.</li> <li>• From educational establishments attended by the employee.</li> <li>• From the public domain.</li> </ul>
Persons with whom Chambers will share the data	<ul style="list-style-type: none"> <li>• Members of Chambers for the purposes of the administration of Chambers.</li> <li>• Chambers' accountant.</li> <li>• Public and regulatory bodies, such as HMRC, the Ministry of Justice, and the Bar Standards Board, in order to comply with legal and regulatory obligations by which Chambers are bound.</li> <li>• Persons involved in the event of a dispute between the employee and Chambers, such as Chambers' legal advisers and any court or tribunal adjudicating the dispute.</li> </ul>
Retention period	For the duration of employment and for seven years thereafter. Retention beyond this period subject to Chambers' legitimate interest (e.g. an on-going dispute between the employee and Chambers) or consent.

#### 7.6. Third-party service-providers

<b>Third-Party Service Providers</b>
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Personal data held	<p>Personal data which it is foreseeable that Chambers are likely to obtain from external suppliers include:</p> <ul style="list-style-type: none"> <li>• <b>Name</b></li> <li>• <b>Address</b></li> <li>• <b>Telephone number</b></li> <li>• <b>E-mail address</b></li> <li>• <b>Payment, bank, and other financial details</b></li> <li>• <b>Education, training and employment details</b></li> </ul>
Purpose of processing	<ul style="list-style-type: none"> <li>• For accountancy and administrative purposes.</li> </ul>
Basis for processing personal data	<ul style="list-style-type: none"> <li>• Consent.</li> <li>• For the purposes of the fulfilment of a contract between Chambers and the service-provider.</li> <li>• For compliance with legal obligations by which Chambers are bound.</li> </ul>
How the data are obtained	<ul style="list-style-type: none"> <li>• Directly from the service-provider.</li> <li>• Referrals from other clients of the service-provider.</li> <li>• From the public domain.</li> </ul>
Persons with whom Chambers will share the data	<ul style="list-style-type: none"> <li>• Members of Chambers for the purposes of the administration of Chambers.</li> <li>• Other potential clients of the service-provider by way of referrals.</li> <li>• Any persons as required in the event of a complaint about the service-provider or a legal dispute between Chambers and the service-provider, such as the service-provider's employer, the service-provider's professional organisation or regulatory body, a dispute-resolution service or ombudsman, Chambers' solicitors or other legal representatives, the service-provider's solicitors or legal representatives, and/or HMCTS.</li> </ul>
Retention period	<p>Seven years following the conclusion of Chambers' relationship with the service-provider. In the event of a legal dispute, seven years following the conclusion of the case.</p>

### 7.7. Pupils and mini-pupils

<b>Pupils and mini-pupils data table</b>
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Personal data held	<p>Personal data which it is foreseeable that Chambers are likely to obtain from external suppliers include:</p> <ul style="list-style-type: none"> <li>• <b>Name</b></li> <li>• <b>Address</b></li> <li>• <b>Telephone number</b></li> <li>• <b>E-mail address</b></li> <li>• <b>Payment, bank, and other financial details</b></li> <li>• <b>Education, training and employment details</b></li> <li>• <b>Special categories of personal data.</b> This can include information about your health (including medical records), race or ethnic origin, political opinions, religious, philosophical or other beliefs, trade union membership, sex life or sexual orientation, genetic data, or biometric data.</li> <li>• Details about any <b>criminal convictions</b> that you may have, including DBS and/or PNC data.</li> </ul>
Purpose of processing	<ul style="list-style-type: none"> <li>• For accountancy and administrative purposes.</li> <li>• To comply with regulatory requirements concerning the training of pupils.</li> </ul>
Basis for processing personal data	<ul style="list-style-type: none"> <li>• Consent.</li> <li>• For the legitimate interest of administering Chambers.</li> </ul>
Basis for processing special categories of personal data	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Purposes in which there is a substantial public interest, namely the administration of justice.</li> </ul>
Basis for processing data relating to criminal convictions and offences	<ul style="list-style-type: none"> <li>• Consent</li> <li>• The performance of tasks carried out in the public interest, namely the administration of justice, the purposes of legal proceedings and the provision of legal advice.</li> </ul>
How the data are obtained	<ul style="list-style-type: none"> <li>• Directly from the pupil/mini-pupil.</li> <li>• From current or former employer(s) of the pupil/mini pupil.</li> <li>• From the pupil/mini-pupil's educational establishment(s).</li> <li>• From any persons nominated by the pupil/mini-pupil to provide a reference.</li> <li>• From the public domain.</li> </ul>

Persons with whom Chambers will share the data	<ul style="list-style-type: none"> <li>• Members of Chambers for the purposes of the administration of Chambers.</li> <li>• Third-party service-providers, such as Chambers' accountant.</li> <li>• Chambers' professional clients, where required in connection with the pupil's work in Chambers.</li> <li>• Any persons as required in the event of a complaint about the pupil/mini-pupil or a legal dispute between Chambers and the pupil/mini-pupil.</li> </ul>
Retention period	For pupils who become members, retention will be as for members. For pupils who do not become members and mini-pupils, retention for seven years from completion of pupillage/mini-pupillage, with further retention to be by consent or based on legitimate interest.

## 8. SENDING DATA OUTSIDE OF THE EEA

8.1. Chambers use the following third party suppliers to manage documents.

These suppliers may therefore have access to your information:

- A hosted system, operated by Advanced Legal Services Limited. They store and operate barristers' emails and diaries, and can host all of their electronic documents including case papers.
- Dropbox and Microsoft OneDrive to remotely store information in the cloud.
- Chambers may process PDFs using Adobe Inc. This may include court bundles sent on PDF, or law reports.

8.2. These suppliers sometimes operate outside of the UK and the EU. In the case of Dropbox, Microsoft OneDrive and Adobe Chambers relies on Privacy Shield arrangements (an acknowledgement by the EU Commission that the provider has adequate security provisions in place – to obtain further details see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en)). In the case of Advanced Legal Services Limited, we have considered their security arrangements and

believe them to be adequate. If you would like information about these please contact us.

**9. CHOOSING NOT TO GIVE US YOUR PERSONAL INFORMATION**

9.1. You may choose not to give us your personal information. However this may delay or prevent us and/or the barrister instructed in your case from meeting our contractual and legal obligations and/or performing the contracted legal services.

**10. WITHDRAWAL OF CONSENT**

10.1. Where Chambers processes personal data on the basis of consent being provided, you may withdraw that consent at any time. However, Chambers may continue to process your personal data if there is another lawful basis for doing so in the absence of your consent. The withdrawal of consent shall not affect the lawfulness of any processing carried on prior to the withdrawal of the consent.

**11. MARKETING**

11.1. Chambers may use your personal information in order to contact you to tell you about training and marketing events that we are organising and which be of interest to you. Chambers will form a view as to what marketing may be of interest to you in light of the data that you have previously provided to us.

11.2. Chambers will only use your personal information to send you marketing messages if we have either your consent or a legitimate interest in doing so. We will have a legitimate interest where we have a business or commercial reason to use your information.

11.3. You can ask Chambers to stop sending you marketing messages by contacting us at any time.

## 12. YOUR RIGHTS

### 12.1. Overview

12.1.1. If Chambers holds information about you then you have the following rights in respect of Chambers' use of that information:

- A right of access to your information and to details about how it is used;
- A right to rectification of inaccurate information;
- A right to have information erased;
- A right to restrict the use that Chambers may make of your information;
- A right to information portability;
- A right to object to the processing of your information.

12.1.2. To exercise any of these rights, contact Chambers using the details in section 2 above. You can find more detail about these rights below.

12.1.3. Chambers will comply with any of these rights as soon as possible and in any event no later than one month from the request (although if the request is complex or there are numerous requests this may be extended by up to two further months).

12.1.4. Chambers will not charge for any request, unless it is manifestly unfounded or excessive (for example because it is repetitive). If a request is manifestly unfounded or excessive then Chambers will either charge reasonable administrative costs to comply with it, or

tell you that we are not going to comply because it is manifestly unfounded or excessive.

## **12.2. Right of access to information**

12.2.1. You may request access to the information that Chambers holds about you, together with information about the purposes for which that information is used, the type of information held, who it is disclosed to, and the length of time which for which it is held. This is commonly referred to as a subject access request. However, Chambers does not have to disclose any information which is subject to legal professional privilege, or may identify another person.

## **12.3. Right to rectification**

12.3.1. If Chambers holds any inaccurate information about you please let us know as soon as possible and I will correct it. You may also request that Chambers supplement any incomplete information that is held about you.

12.3.2. If Chambers rectifies or supplements any information that is held about you then we will let any third parties to whom we have provided this information know, unless this is impossible or disproportionate. If you ask Chambers to, we will tell you to whom we have disclosed this information.

## **12.4. Right to erasure**

12.4.1. In certain circumstances you can ask that Chambers erase the information that we hold about you, namely:

- Chambers no longer needs to keep it for the purposes for which it was collected or used;

- Chambers' only basis to process it is your consent and you withdraw that consent;
- You object to Chambers' use of the information and Chambers does not have any overriding legitimate grounds to continue using the information;
- Chambers is using the information unlawfully;
- Chambers has to erase it in order to comply with a legal obligation.

12.4.2. If you wish to have information about you erased please contact Chambers and we will consider the request. However, there are some circumstances in which we do not need to comply with such a request, for example if we need the information for the establishment exercise or defence of legal claims, or its use is in the public interest.

12.4.3. If Chambers erases any information that we hold about you then we will let any third parties to whom we have provided this information know, unless this is impossible or disproportionate. If you ask us to, we will tell you to whom we have disclosed this information.

## **12.5. Right to data portability**

12.5.1. Where Chambers' processing of your information is based on consent and the processing is carried out by automated means then you have the right to have that information provided to you in a commonly-used format, provided that this is technically feasible.

## **12.6. Right to restrict processing**

12.6.1. In certain circumstances you can ask that Chambers restrict how we use your information:

- You have made a request for rectification or to supplement inaccurate information. You can ask that we restrict your processing while the request is dealt with;
- The use of the information is unlawful, but you ask that Chambers restrict its use of the information rather than delete it;
- Chambers no longer need to use it but you want us to keep it so that you can use it for a legal claim.

12.6.2. In these circumstances Chambers will stop using your information (although we may still store it) unless you consent to our use, we need it for legal claims, we need to use it to protect another person or where there is an important public interest in us doing so. For example, Chambers may still process information if needed to progress a case.

12.6.3. If Chambers restricts the use of any information that we hold about you then we will let any third parties to whom we have provided this information know, unless this is impossible or disproportionate. If you ask us to we will tell you to whom we have disclosed this information.

## **12.7. Right to object to processing**

12.7.1. You have the right to object to Chambers using your information where we base our use on either it being in the public interest or it being for legitimate interests (see section 7 above). If you do so and Chambers has no other basis to process it, Chambers can only

continue to process it if we can demonstrate that there are compelling grounds to do so which override your interests, or Chambers need it for legal claims.

### 13. COMPLAINTS

13.1. As a data controller, Chambers is registered with and regulated by the ICO.

If you would like to make a complaint concerning Chambers' processing of your personal data, you may do so directly to Chambers, or to the ICO.

13.2. If you wish to complain to Chambers directly, you may do so to:

The Head of Chambers  
Gough Square Chambers,  
6-7 Gough Square,  
London,  
EC4A 3DE  
Telephone: 0207 353 0924  
Email: [gsc@goughsq.co.uk](mailto:gsc@goughsq.co.uk)

13.3. If you wish to complain to the ICO, you may do so on **0303 123 1113**. More information about your right to complain can be found at **[www.ico.org.uk](http://www.ico.org.uk)**.