



DATA PROTECTION NOTICE

OBEID LEGAL SERVICES & CONSULTANCY LTD
T/A
OBEID SOLICITORS

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SRA Regulated
8009531

Tel: 0161 706 2020 | Email: Bell@obeidsolicitors.co.uk | Website: www.obeidsolicitors.co.uk

Obeid Solicitors is a trading name of Obeid Legal Services & Consultancy Ltd, company number 11168748, registered at City View House, 5 Union Street, Ardwick Manchester, England, M12 4JD.

Obeid solicitors is authorised and regulated by the SRA number 8009531.

1. INTRODUCTION

Obeid Solicitors (“We”) are committed to respecting your privacy and protecting your personal data. This privacy policy tells you how we will do so, including how we will look after your personal data, how we will process and use it, how and when we will transfer and share your personal data and the rights that you have in relation to this under the UK GDPR and Data Protection Act 2018.

This notice applies to all of your personal data used in connection with our services however it is obtained by us, including any data you may provide through our website, when you meet with us, or when you contact us by phone, by post or using email.

For the purposes of the UK GDPR and Data Protection Act 2018 we are the data controller.

In the event that we ask you to provide personal data, then we will only use that information in accordance with this privacy notice.

Please note that this notice may be updated from time to time. You will be informed of when changes occur to ensure that you continue to be in agreement with any changes that we may have made. The effective date for this policy is 01/12/2024.

Please note that it is important that the personal data we hold about you is accurate and current. For this reason, please ensure that we are kept informed of any changes to your personal data during your relationship with us.

2. WHO WE ARE

This policy is issued by Obeid Solicitors, the trading name of Obeid Legal Services & Consultancy Ltd (Company Number: 11168748). Our firm is registered at City View House, 5 Union Street, Ardwick, Manchester, England, M12 4JD. Obeid Solicitors is authorised and regulated by the Solicitors Regulation Authority (SRA Number: 8009531).

Our Data Privacy Manager is Amir Obeid and he is responsible for overseeing all matters in connection with this privacy notice. If you have any questions about this privacy notice, including any requests to the right to exercise your legal rights (see below), please contact him using the details set out above.

Please note that you have the right to make a complaint relating to your personal data at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. WHAT IS PERSONAL DATA?

Personal data is defined by the UK GDPR as any information relating to an identifiable individual (a “data subject”) as opposed to information about organisations, corporate bodies or others who are not individuals. An identifiable individual is one who can be identified, directly or indirectly, by reference to a name, identification number, location data, online identifier or to one or more factors

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specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

Personal data does not include data where the identity has been removed (also known as anonymous data).

Further details about the UK GDPR, Data Protection Act and the nature of personal data can be found at the website for the Information Commissioner (www.ico.gov.uk).

4. THE INFORMATION WE COLLECT

We may collect use, store and transfer a range of information relating to you. The precise nature of that information may depend upon the type of matter in which we are, or will be, instructed. It may include, but may not be limited to:

- Identity – this may include your name, former/maiden name, username, other method of identification, passport/driving licence number, gender, date of birth, marital status, employment status or nationality. It may also include information relating to third parties with whom you have a connection.
- Contact information – this may include your home address, workplace address, telephone and mobile numbers, email address, alternative contacts and social media details.
- Financial information – this may include bank account details, payment card details, tax or NIS references, salary, savings and investments, sums owing to third parties and details of any previous bankruptcy or financial judgments.
- Transaction details – including information relating to the matter in connection with which we are currently instructed, services provided to you previously both by this firm and others.
- Miscellaneous information - including technical information relating to system used by the data subject, preferences and interests,
- Marketing information - information used in connection with customer surveys and/or offers, information relating to the other services offered by us in which you might be interested and other marketing related information.
- Aggregated Data – this may include statistical or demographic data and may be derived from your personal data.

However, we do not consider this to be personal data as it does not directly or indirectly reveal your identity. Thus, your information may be used to calculate the percentage of users accessing a specific website feature. In the event that Aggregated Data is combined with your personal data in such a way that it can directly or indirectly identify you, then we will regard such combined data as personal data and it will be processed entirely in accordance with this privacy notice.

This information will normally be collected from you by means of direct communication, such as through forms completed during consultations, instructions, emails, phone calls, or via our secure online client portal. This information will typically be collected from you in person when you provide details related to your matter, through our website when booking an appointment, or via any additional forms of direct communication, such as phone calls or emails.

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You should note that we will not routinely collect any data about you which comes within the definition of special categories of personal data and referred to in Article 9 of the UK GDPR. This includes details revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. If, however, this information is relevant to the matter in connection with which we are instructed then we may need to process that data but we will obtain your explicit consent to do so. On occasion we may process data about criminal offences. As solicitors we are officers of the court and process any such information in this capacity.

Please note that if you fail to provide us with any personal data that is required by law, or under the terms of a contract we have with you then we may be unable to carry out the contract we have or are trying to enter into with you. In this is the case then we may have no option but to cancel the provision of services to you. Should this occur, we will notify you if this is the case at the time.

Note that our costs in relation to any services provided to you up to the time at which we can no longer act will remain owing notwithstanding the termination.

5. HOW WE COLLECT INFORMATION

We obtain personal data in a number of different ways. These include:

- By direct contact – personal data is provided by you either in person, by corresponding with us by post, by email, by completing a form, by completing an online application or form, by telephone, via social media or otherwise.
- From third parties or publicly available sources – we may obtain personal data about you from third parties (for example disclosure by the police or CPS in connection with a prosecution or from an estate agent acting in connection with your sale or purchase of a property) in connection with the provision of services by us to you. We may also obtain or receive information from publicly available sources such as Companies House and HM Land Registry.
- Using automated technologies - your interaction with our website may automatically collect Technical Data about your equipment, browsing actions and patterns which we can collect by using server logs and other similar technologies.
- From identity checking providers - such as Verify 365, Thirdfort, SmartSearch, Experian, Trulioo and other similar services.
- From other parties involved in a matter.

6. HOW WE USE YOUR DATA

We will only use your personal data when we are permitted to do so and the law allows. Most commonly, we will use your personal data in the performance of the contract we have entered into with you or are about to enter into with you.

The bases upon which we will rely in processing and handling your personal data will usually be:

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- Because the processing is necessary for the performance of a contract to which you are a party or to take preliminary steps with a view to entering in to a contract with you.
- Where we need to comply with a legal or regulatory obligation to which we are subject.
- Where the processing is necessary in order to protect your vital interests or those of another natural person.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

We will not normally rely on consent as a legal basis for processing your personal data other than in relation to sending marketing or other information to a prospective client. If this applies then you have the right to withdraw that consent at any time and you should contact us should you wish to do so.

We may need to rely on more than one legal basis in order to process your personal data for the specific purpose for which we are using it. Should you require more details concerning this, or if you would like details about the specific legal bases upon which we will be or are relying, then please contact the Data Privacy Manager referred to above.

In addition to the general provisions set out above, the following are specific situations in which we may process your personal data:

- Registering You As A New Client;
- Carrying Out Identity And Credit Checks;
- Generally Providing Services To You;
- Notifying You Of Any Relevant Policies And Processes And Any Changes Thereto;
- Addressing Correspondence And Related Documents To Other Parties And Opponents;
- Corresponding With Other Agencies Such As The Courts Or Government Agencies Where Relevant To The Work We Are Doing For You;
- Maintaining The Financial And Other Personal Information We Are Required To Keep On Clients Under The Professional Rules We Are Subject To And By Law Including Our Obligations To Hmrc;
- Compliance With Legal And Regulatory Obligations And Good Practice, E.G. Identifying Clients And Verifying Their Identity;
- Gathering Information As Part Of Investigations By Regulatory Bodies;
- Ensuring Business Policies Are Adhered To (Such As Policies Covering IT Security And Internet Use);
- Operational Reasons, Such As Recording Transactions, Training And Quality Control;
- Ensuring The Confidentiality Of Commercially Sensitive Information;
- Statistical Analysis;
- Preventing Unauthorised Access And Modifications To Systems; Updating And Enhancing Client Records;
- Analysis To Help Us Manage Our Practice;
- Statutory Returns;
- Ensuring Safe Working Practices, Monitoring And Managing Staff Access To Systems And Facilities And Staff Absences;

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- Staff Administration And Assessments, Monitoring Staff Conduct, Disciplinary Matters;
- Credit Reference Checks Via External Credit Reference Agencies.

In most cases we will only use your personal data for those purposes for which it was acquired, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. In the event that this is the case we are happy to explain to you how the processing for the new purpose is compatible with the original purpose.

In the event that we need to use your personal data for an unrelated purpose, we will contact you and explain the legal basis which allows us to do so.

Where it is required or permitted by law, we may process your personal data without your knowledge or consent, in compliance with the above rules.

7. SHARING YOUR PERSONAL DATA

From time to time, it will be necessary for us to share your personal data with parties involved with the handling of your matter, and with others with whom we are under a legal or regulatory obligation to share such data. Those with whom that information will be shared may include, depending upon the circumstances:

- Service Providers,
- Professional Advisers Including Other Lawyers, Bankers, Auditors And Insurers Who Provide Consultancy, Banking, Legal, Insurance, Accounting And Other Professional Services,
- Professional Experts And Those Involved In The Writing Or Provision Of Reports,
- Other Contractors Working For The Firm,
- Hm Revenue & Customs, Regulators And Other Authorities Based In The United Kingdom Who Require Reporting Of Processing Activities In Certain Circumstances,
- Hm Land Registry, Information Commissioner's Office, Intellectual Property Office, Companies House, Hm Courts And Tribunal Services {Add Any Further Public Organisations With Whom You Deal Regularly} And Any Other Public Office Based In The United Kingdom,
- Fraud Prevention, Credit Reference And Identity Verification Agencies,
- Regulators Such As The SRA Or ICO,
- The Legal Ombudsman,
- The Law Society,
- Mediation And Arbitration Service Providers, And
- Employees Of The Firm.

In the event that there is a change to our business, then any new owners may use your personal data in the same way as set out in this privacy notice.

Please be assured that we require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your

personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

It is our policy not to transfer your personal data outside the United Kingdom other than as specifically mentioned above or on your instructions as part of our engagement by you. In the event that an external third parties are based outside the UK, then we will ensure that a similar degree of protection is afforded to it by ensuring that we only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

8. SECURITY

We are committed to ensuring that your information is secure. All electronic devices used by us are password protected and only authorised persons have access to those devices and passwords. Only strong passwords shall be used. Where there are more than one authorised persons with access to one electronic device, each person will have their own password.

In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. These include:

- **24/7 Building Security:** Our building is monitored by security personnel around the clock, ensuring protection of the premises at all times.
- **Password-Protected Devices:** All devices, including computers and mobile devices, are secured with strong passwords to control access.
- **Office Security:** Our office premises are locked each night, with access restricted to authorised personnel only.
- **Clear Desk Policy:** We enforce a strict clear desk policy to prevent unauthorised access to sensitive information during and after business hours.
- **Data Backup:** All information is regularly backed up to a secure, encrypted storage system to prevent data loss.
- **Secure Storage of Physical Files:** Hard copy files are stored in locked cabinets or secure storage areas, accessible only to authorised staff.
- **Paperless Operations:** We maintain a largely paperless office to reduce the risk of physical data breaches.
- **Digital File Protection:** Documents and client data are managed using encrypted, secure file management software with robust access controls.
- **Continuous Security Monitoring:** Our online systems are actively monitored for security threats, ensuring timely detection and response.

Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

9. RETENTION OF DATA

In the event that you do not instruct us in relation to a legal matter, then we will retain your personal data for a period of 6 months.

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In the event that you instruct us to act for you in relation to a legal matter, then we will retain your personal data during the currency of your matter and thereafter in accordance with our usual retention periods, details of which are set out in our client care letter.

We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with SRA regulations, tax requirements and exemptions, and the establishment, exercise or defense of legal claims.

10. CLIENT & THIRD PARTY DUE DILLIGENCE

Obeid Solicitors is legally obligated under the UK Money Laundering Regulations 2017 (as amended) to carry out Client Due Diligence (CDD). This process verifies the identity of our clients and, where necessary, any third parties connected to a matter, ensuring compliance with anti-money laundering and counter-terrorism financing laws.

To streamline this process, we utilise Verify 365, a secure and innovative digital platform designed for compliance verification. This ensures that your data is handled efficiently and securely throughout.

Key Steps in the Verify 365 Process:

- **Digital Identity Verification:** You will securely upload valid identification (e.g., passport or driving licence) and complete a live selfie for biometric matching to confirm your identity.
- **Document Submission:** Relevant documents, such as proof of address or evidence of the source of funds, will be submitted via an encrypted online portal.
- **Compliance Screening:** Comprehensive checks are performed against sanctions lists, politically exposed persons (PEP) databases, and other watchlists.
- **Credit Reference Check:** Verify 365 may use credit reference data to confirm identity details, leaving a "soft footprint" that does not affect your credit score and is only visible to you.
- **Legal Basis for Processing:** We process your data in line with the following lawful bases:
- **Legal Obligation:** To comply with regulatory requirements for anti-money laundering and financial crime prevention.
- **Substantial Public Interest:** For the prevention of criminal activities and safeguarding legal integrity.
- **Consent:** For biometric data processing (e.g., facial recognition), where explicit consent will be obtained.

Why This Information is Essential:

- Verify your identity.
- Assess risks associated with a matter.
- Ensure compliance with financial regulations.

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Failure to provide the requested information may result in our inability to act on your behalf or process funds related to your matter.

11. E-SIGNATURES

At Obeid Solicitors, we utilise e-signature software, including Clio and DocuSign, to streamline the process of signing documents while maintaining the highest standards of security and compliance. E-signatures offer a convenient and efficient method for executing agreements, enabling us to handle your matters more effectively.

How E-Signature Software Works

- Your contact details (e.g., email address) will be securely input into the chosen e-signature platform.
- The relevant document or contract, which may contain personal data about you, will be uploaded for your review and signature.
- You will receive an email invitation with a secure link to access and sign the document electronically.

Security Measures

Both Clio and DocuSign employ industry-standard encryption and secure transmission protocols to ensure the confidentiality and integrity of your data during the signing process.

- Key security measures include: Two-Factor Authentication (2FA): Optional 2FA can be enabled to ensure only authorised individuals access the document.
- Audit Trails: Each signed document includes an audit trail detailing actions such as when the document was viewed, signed, and completed.
- Data Encryption: All data, including the uploaded documents and your signature, is encrypted both in transit and at rest.
- Secure Servers: Data is stored on servers within the European Economic Area (EEA) to comply with data protection regulations, including the UK GDPR.

Retention and Deletion of Data

- Documents signed via Clio or DocuSign are stored only for the duration necessary to fulfil the purposes for which they were collected.
- Once the matter is concluded, or upon request, documents are either securely archived in accordance with our Data Retention Policy or permanently deleted from the e-signature platform.
- Metadata and audit trails associated with signed documents may be retained securely for regulatory compliance or evidential purposes, as permitted under data protection laws.

Legal Validity and Risk Mitigation

E-signatures obtained through Clio and DocuSign are legally recognised under the Electronic Communications Act 2000 and the eIDAS Regulation.

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- To further mitigate risks: We only use platforms that meet or exceed legal standards for electronic signatures.
- By signing electronically, you confirm that you have reviewed the document, understand its terms and agree to proceed on this basis.
- If you are unable or unwilling to use e-signature software, alternative signing arrangements, such as physical signatures, can be made upon request.

Your Data Protection Rights

- All personal data processed during the e-signature process is handled in compliance with the UK GDPR and the Data Protection Act 2018.
- You may request access to your data, object to its processing, or ask for its deletion at any time.

Liability and Indemnity

While every effort is made to ensure the security and integrity of your data during the e-signature process, Obeid Solicitors shall not be liable for any breaches arising from circumstances beyond our control, such as unauthorised access to your email account or device. Clients are encouraged to use secure, private devices and email accounts when accessing e-signature documents.

12. YOUR LEGAL RIGHTS

In the event that you are not happy with any aspect of our use of your personal data you have the right to complain to the Information Commissioner at ico.org.uk - Tel: 0303 123 1113.

You also have the right to obtain confirmation that your personal data is being processed by us and obtain a copy of your personal data from us. This will be provided without charge. Please send such requests to [Bell@obeidsolicitors.co.uk](mailto:bell@obeidsolicitors.co.uk). This is known as a Subject Data Access Request which will in normal circumstances be dealt with within one month of receipt, unless the matter is complex in which case we may notify you that we wish to extend by up to two months the time in which we will respond to that request.

Please note that until such time as we are satisfied that the person making the request is entitled to the information requested, we will not release any information or acknowledge whether or not such information is held by us.

Please note that we have the right to charge reasonable fees for additional copies of information that has already been supplied to you, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

You also have various other rights in relation to your personal data which you may be able to exercise (depending upon the circumstances). These include:

- the right to ask us to correct personal data that is inaccurate or incomplete. Where relevant, we will rectify the personal data in question, and inform you of that rectification, within one month

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of you informing us of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.

- the right to ask us to delete your personal data or stop processing it, unless it is necessary for us to retain it to comply with our legal obligations and/or the exercise or defence of legal claims. Unless we have reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and you will be informed of the erasure, within one month of receipt of your request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.
- the right to restrict our use of your personal data. You may request that we cease processing the personal data we hold about you. If you make such a request, our firm shall retain only the amount of personal data concerning you (if any) that is necessary to ensure that the personal data in question is not processed further. Please note that if the data is used in relation to your instructions to us then we may no longer be able to perform those instructions and may need to cease acting for you.
- the right to object to us using your personal data. Where you object to us processing your personal data based on the basis of legitimate interests, we will cease such processing immediately, unless it can be demonstrated that our legitimate grounds for such processing override your interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.