

Privacy

The members of the Chambers of Gavin Kealey Q.C. (hereafter referred to collectively as “**7KBW**” or “**Chambers**”) are committed to respecting the privacy of everyone who visits our website (7kbw.co.uk) (“**the Site**”) or contacts us via the Site and every person:

1. who uses the services that we make available from the Site;
2. who engages with members of Chambers to use the services that we provide (be it through the Site or not) (our “**Services**”);
3. whose personal data we may process as a result of providing the Services to others; or
4. who applies to work with us (as a mini-pupil, pupil, or barrister).

1. Purpose of this privacy notice

This Privacy notice (“**Privacy notice**”) explains our approach to any personal data that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal data in order to assist you in making informed decisions when using the Site and/or our Services. This Privacy Notice also sets out your rights to request that we delete, update, transfer and/or provide you with access to your personal data. Please take a moment to read and understand it.

2. Who are we and what do we do?

The Site and our Services are operated by 7KBW (“**we**”, “**us**” or “**our**”). The individual members of Chambers are themselves data controllers. A list of all current members of Chambers can be found [here](#) (note: the members of Chambers are the barristers and arbitrators listed on this page; honorary members are not members of Chambers for the purposes of this notice).

3. How to contact us

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

1. sending an e-mail to seniorclerks@7kbw.co.uk; or
2. calling us on 020 7910 8300.

4. What personal information do we collect and how do we use it?

Our primary goal in collecting personal data from you may be to: (i) verify your identity; (ii) help members of Chambers deliver our Services; (iii) improve, develop and market new Services; (iv) carry out requests made by you on the Site or in relation to our Services; (v) investigate or settle inquiries or disputes; (vi) comply with any applicable law, court order, other judicial process, or the requirements of a regulator; (vii) enforce our agreements with you; (viii) protect the rights, property or safety of us or third parties, including our other clients and users of the Site or our Services; (ix) provide support for the provision of our Services; (x) recruitment purposes (including mini-pupillage and pupillage); and (xi) use as otherwise required or permitted by law.

To undertake these goals we may process the following:

If you are a visitor to the Site:

1. Name and job title.
2. Contact information including email address.
3. Demographic information such as postcode, preferences and interests.
4. Other information relevant to provision of our Services.

If you are an individual client in receipt of our Services or a prospective individual client:

1. Name and job title.
2. Contact information including email address.
3. Payment information.
4. Other information relevant to provision of our Services.
5. Information that you provide to us as part of our members providing the Services to you. This would depend on the nature of the instructions and the work that members carry out further to these instructions.
6. Relevant information as required by conflict checks and regulatory requirements.

Primarily our members are engaged on behalf of corporate instructors (i.e. corporate entities). The people that instruct us on behalf of the corporate entity are data subjects (but the corporate entity on whose behalf we are instructed to act is not). As a result of our instructions we may collect the personal data of our instructing solicitors, the solicitors' clients (and the clients' workers (e.g. its employees, directors, contractors, agents and other workers)) and/or the opponent's personal data, including personal data relating to their legal advisors or workers (as above) as relevant.

If you are an individual whose personal data is processed by our members as a result of providing the Services to others (including individual clients and corporate clients) we will process a variety of types of personal information depending on the Services provided. This may include (but is not limited to):

1. Name, role and job title.
2. Salary or other remuneration information.
3. Contact information including email address.
4. Identifiers such as (but not limited to) national insurance number, domicile, employment status, family members, special data including nationality.
5. Other information relevant to provision of our Services.

Please note that members of Chambers do not have a legal obligation to provide information to you about how we process your personal information when we do so as a result of providing the Services to others where members of Chambers are covered by professional obligations of secrecy. We are providing this information in order to be as transparent as our professional obligations permit us to be about our data privacy practices.

We may also need to process personal information in relation to other third parties instructed either by our members' own clients or other persons or companies with whom we might liaise in providing Services to our clients (for example, foreign law firms and factual or expert witnesses).

If you are a potential recruit:

1. Name and job title.
2. Contact information including email address.
3. Curriculum vitae, your education, employment history (including salary or other remuneration information) and similar matters and other similar information that you may provide to us.
4. Other information relevant to potential recruitment, for example information received from referees.

We may use your personal data for the following purposes:

Fulfilment of services

Our members collect and maintain personal information that you voluntarily submit to our members during your use of the Site and/or our Services to enable our members to perform the Services. Please note that all members of Chambers accept instructions on the Standard Contractual Terms for the Supply of Legal Services by Barristers to Authorised Persons 2012 and these [terms](#) will apply when we provide the Services unless otherwise expressly agreed in writing.

(a) Who do we share your personal information with for this purpose?

We may share personal information with a variety of the following categories of third parties as necessary when providing the Services:

Other controllers:

- *Arbitrators*
- *Adjudicators*
- *Mediators*
- *Witnesses*
- *Third party funders*
- *Costs draftsmen*
- *Instructing Solicitors*
- *Insurers*
- *Regulators/tax authorities/corporate registries*
- *Other Counsel*
- *Court (including listing offices, judges and their clerks)*
- *Opposing party, opposing party's lawyers*
- *Experts (for example foreign lawyers, tax, medical, accountant, surveyors, valuers, etc.)*

Processors:

- *7KBW Limited, our service company*

- *Clerks*
- *Witnesses*
- *Translators*
- *Transcribers*
- *Process Servers*
- *Couriers*
- *Document review platforms*
- *IT service providers who host data and IT support services*
- *IT administrative service providers such as diary management*
- *Our pupils*
- *Our mini-pupils*
- *Pupillage Gateway*

Please note this list is non-exhaustive and there may be other examples where we need to share your personal information with other parties in order to provide the Services effectively.

(b) What is our legal basis?

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or a third party or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in the best way that we can.

Client services enquiries

Our Site uses various user interfaces to allow you to request information about our Services: these include an electronic enquiry form and an email and telephone enquiry service. Contact information may be requested in each case, together with details of other personal data that is relevant to your Services enquiry. This information is used in order to enable us to respond to your requests.

(a) Who do we share your personal information with for this purpose?

We will share data with 7 KBW Limited, a service company which carries out much of the administration of Chambers on behalf of the members.

(b) What is our legal basis?

It is in our legitimate interest or a third party's legitimate interest to use your personal data in such a way to ensure that we provide the very best client service and answer any of your specific enquiries.

Your feedback about our services

From time to time we will contact you to invite you to provide feedback about our members' Services, either online or by email or post. We use this information to help us improve the quality of service provided. We also use your feedback to monitor the quality of our Services.

(a) Who do we share your personal data with for these purposes?

We will share data with 7 KBW Limited, a service company which carries out much of the administration of Chambers on behalf of the members. Where we have expressly requested feedback for the purpose of directory submissions, we may share such feedback with the relevant directory..

(b) What is our legal basis?

It is in our members' legitimate business interests to use the information you provide to us in your feedback for the purposes described above. If we propose to share this information externally we will seek your consent.

Business administration and legal compliance

We use your personal data for the following business administration and legal compliance purposes:

- to comply with our legal obligations (including, without limitation, obligations to maintain regulatory insurance, obligations to the Bar Standards Board and/or Bar Council and/or any relevant legal service provider regulator; Know Your Client or Anti-Money Laundering or Anti-Bribery or similar obligations);
- to respond to enquiries, investigations and to deal with regulators, relevant tax authorities, crime and law enforcement agencies and similar bodies;
- for internal training and administration purposes;
- to enforce our legal rights; and
- to protect rights of third parties.

(a) Who do we share your personal data with for these purposes?

We may share your personal data among members of Chambers and with 7 KBW Limited (a service company which carries out much of the administration of Chambers on behalf of the members) for the above purposes and, externally, may share your personal data with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities, crime and enforcement agencies and judicial bodies. We will also share your personal data relating to particular cases with our pupils and mini-pupils for the purposes of training them.

(b) What is our legal basis?

Where we use your personal data to enforce our members' legal rights, or to protect the rights of third parties, or for training purposes, it is in our members' or a third party's legitimate interests to do so. For all other purposes described in this section, it is our members' legal obligation to use your personal data to comply with any legal obligations imposed upon our members.

Recruitment

We use your personal data for the following recruitment purposes:

- To assess your suitability for any position for which you may apply at our Chambers including barrister positions, pupillage and mini-pupillage positions, whether such application has been received by us online, by email, by hard copy, via a third party recruiter or portal or in person.

- To review our equal opportunity profile in accordance with applicable legislation and demonstrate that we do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by applicable legislation and that all employment related decisions are made entirely on merit.

(a) Who do we share your personal data with for these purposes?

We will share your personal data with members of Chambers involved in recruitment, and with our service company, 7KBW Limited, and (for the purposes of obtaining references), with referees.

(b) **What is our legal basis?**

Where we use your personal data in connection with recruitment, it will be in connection with our taking steps at your request to enter or consider entering into a contract with you or it is in our legitimate interests to use personal data in such a way to ensure that we can make the best recruitment decisions. We will not process any special data except where we are able to do so under applicable legislation or with your explicit consent.

Client insight and analysis

We analyse your contact details with other information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services.

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal data from the computer hardware and software you use to access the Site, or from your mobile device. This includes the following:

- an IP address to monitor Site traffic and volume;
- a session ID to track usage statistics on our Site;
- information regarding your professional interests, experiences with our Services and contact preferences.

Our web pages and e-mails contain “cookies” “web beacons” or “pixel tags” (“**Tags**”). Tags allow us to track receipt of an e-mail to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag. In some of our e-mail messages, we use a “click-through URL” linked to certain websites administered by us or on our behalf.

Please see our Cookie Policy for further information.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Site and our Services. This allows us to learn what pages of our Site are most attractive to our visitors, and which parts of our Site are the most interesting.

(a) **Who do we share your personal data with for these purposes?**

We share your personal data with our service company, 7KBW Limited, and with a variety of third party service providers to assist us with client insight analytics. These providers include Google Analytics, Vuture, and ActiveCampaign for our email updates.

(b) **What is our legal basis?**

Where your personal data is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under data protection laws. Our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal data is not in an anonymous form, it is in our legitimate interest to use your personal data in such a way to ensure that we provide the best products and services to you and our other clients.

Marketing communications

We carry out the following marketing activities using your personal information:

Postal marketing

We use your name and address to send you marketing communications by post.

Our postal marketing will include personalised and non-personalised postal marketing. Personalised marketing is marketing which has been specifically tailored to you. For example, our personalised postal marketing will feature those of our Services that we think are most likely to appeal to you. Non-personalised marketing is marketing about our Services generally and is not tailored to any particular individual.

Where we are sending you personalised postal marketing, we also use information that we observe about you from your interactions with our Site, with our email communications to you and/or with our Services in order to decide what sort of personalised marketing communications to send you. Please see the “Client Insight and Analysis” section above for more details about the personal information collected and how it is collected.

(a) Who do we share your personal data with for these purposes?

We share your personal data with a variety of third party postal providers who assist us in delivering our postal marketing campaigns to you.

(b) What is our legal basis?

Where your personal data is not in an anonymous form, such as your postal address, it is in our legitimate interest to use your personal data for postal marketing.

Email marketing

We use your name and email address to send you marketing communications by email, where you have consented to receive such marketing communications or where we have another lawful basis to do so.

Our email marketing will include personalised and non-personalised email marketing. Personalised marketing is marketing which has been specifically tailored to you. For example, our personalised email marketing will feature those of our Services that we think are most likely to appeal to you. Non-personalised marketing is marketing about our Services generally and is not tailored to any particular individual.

Where we are sending you personalised email marketing, we will also use information that we observe about you from your interactions with our Site, with our email communications to you and/or with our Services in order to decide what sort of personalised marketing communications to

send you. Please see the “Client Insight and Analysis” section above for more details about the personal information collected and how it is collected.

(a) Who do we share your personal data with for these purposes?

We share your personal data with our service company, 7KBW Limited, and third party email marketing providers who assist us in delivering our email marketing campaigns to you.

(b) What is our legal basis?

Where your personal data is completely anonymised, we do not require a legal basis to use it as the personal data will no longer constitute personal information that is regulated under data protection laws. Our collection and use of such anonymised personal data may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal data is not in an anonymous form, it is in our legitimate interest to use your personal data for marketing purposes.

We will only send you marketing communications via email where you have consented to receive such marketing communications, or where we have a lawful right to do so.

5. Third party contractors and other controllers

As mentioned above, our members may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, IT service providers, 7KBW Limited and others included in the above list of processors and controllers, who will process personal data on our behalf and at our direction. Our members conduct an appropriate level of due diligence and put in place necessary contractual documentation in relation to any sub-contractor to ensure that they process personal data appropriately and according to our legal and regulatory obligations.

Further, we may appoint external data controllers in common where necessary to deliver the Services (for example, but without limitation, solicitors, other barristers or third party experts). When doing so we will comply with our legal and regulatory obligations in relation to the personal data including, but without limitation, where necessary putting appropriate safeguards in place to ensure any personal information is processed according to our legal and regulatory obligations.

6. Extra-EEA transfers

Where necessary to deliver the Services our members may transfer personal data to countries outside the EEA. When doing so our members will comply with our legal and regulatory obligations in relation to the personal data including, but without limitation, having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data.

7. How long do we keep your personal data for?

Regarding visitors to the Site who are not clients, we will retain relevant personal data for at least three years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world).

Regarding personal data we have processed as part of providing the Services to any client, we will retain relevant personal information for the relevant limitation period following the completion of the matter on which we were instructed or longer where a claim has been asserted or we are required to do so according to our regulatory obligations or professional indemnity obligations or it

is otherwise in our legitimate interests to do so. We may destroy files and papers without further notice or liability. If you request your files and documents we may charge you for the costs of copying a duplicate.

If personal data is only useful for a short period e.g. for specific marketing campaigns we may delete it.

8. Confidentiality and security of your personal data

We are committed to keeping the personal data provided to us secure and we will take reasonable precautions to protect personal data from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our members and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above) who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the Site and all users of our Services.

9. How to access your information and your other rights

You have the following rights in relation to the personal data that we hold about you:

- **Your right of access.** If you ask us, subject to applicable exemptions, we'll confirm whether we're processing your personal data and provide you with a copy of that personal data (along with certain other details) within the timescales or extended timescales provided for in the GDPR for complex requests, or where applicable, will provide you with an explanation as to why we will not be complying with your request. If you require additional copies, we may need to charge a reasonable fee.
- **Your right to rectification.** If the personal data we hold about you is inaccurate or incomplete, you're entitled to have it rectified in certain circumstances. If you are entitled to rectification and if we've shared your personal data with others, we'll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
- **Your right to erasure.** You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable because that was the legal basis on which we were processing your personal data). If you are entitled to erasure and we've shared your personal data with others, we'll take reasonable steps to let them know about the erasure where possible and where this does not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

- **Your right to restrict processing.** You can ask us to “block” or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data. If you are entitled to restriction and we’ve shared your personal data with others, we’ll let them know about the restriction where it is possible for us to do so and would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we’ll also tell you who we’ve shared your personal data with so that you can contact them directly.
- **Your right to data portability.** With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal data that you’ve provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Your right to object.** You can ask us to stop processing your personal data, and we will do so, if we are:
 - relying on our own or someone else’s legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
 - processing your personal data for direct marketing.
- **Your rights in relation to any automated decision-making and profiling.** Currently no decisions are taken this way.
- **Your right to withdraw consent.** If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time.
- **Your right to lodge a complaint with the supervisory authority.** If you have a concern about any aspect of our privacy practices, including the way we’ve handled your personal data, you can report it to the UK Information Commissioner’s Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

10. Collection of information by third-party sites and sponsors

The Site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites’ privacy notices as Chambers has no control over information that is submitted to, or collected by, these third parties.

11. Changes to this privacy notice

We may make changes to this Privacy Notice from time to time.

To ensure that you are always aware of how we use your personal data, we will update this Privacy Notice from time to time to reflect any changes to our use of your personal data. We may also make changes as required to comply with changes in applicable law or regulatory requirements.

Last updated 24 May 2018, V. 1.0