

CORAM CHAMBERS GENERAL PRIVACY POLICY

Introduction

1. The UK General Data Protection Regulation (“GDPR”) gives you rights in relation to the personal information about yourself that you provide to Coram Chambers and its members. That information is called “personal data” under GDPR. Any use that we make of that personal data is covered by this Privacy Policy. It is in this Privacy Policy that we shall explain in more detail what rights you have in relation to the personal information that you provide to us.
2. This policy sets out the basis upon which any personal data we collect from you, which you provide to us, will be processed. Please read the following carefully to understand our practice when processing personal data and how we will treat it. It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we or one of our members may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Controller

3. Individual members of Chambers are the controllers of any personal data which you supply to them in the course of and during your instructions for the member to provide you with legal services/act as arbitrator, expert determiner, early neutral evaluator or mediator.
4. Coram Chambers is the controller of your personal data when you are applying for any role within Chambers, when you are complaining about a member of Chambers, and/or when Chambers processes your personal data in relation to marketing activities.
5. Chambers has appointed a Data Protection Manager, who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the Data Protection Manager using the details set out below.

Full name of legal entity: Coram Chambers Ltd

Name: Data Protection Manager

Email address: data@coramchambers.co.uk

Postal address: 9-11 Fulwood Place, London, WC1V 6HG

Telephone number: 020 7092 3700

6. You have the right to make a complaint at any time to the Information Commissioner, the UK supervisory authority for data protection issues (www.ico.org.uk). They can be contacted by calling 0303 123 1113. We would, however, like to have the chance to deal with any issues you may have before you contact the ICO—so please do get in touch with us with any queries you may have.

Changes to the Privacy Policy and your duty to inform us of changes

7. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

8. Chambers' website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

9. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
10. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - (a) Identity Data - includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
 - (b) Contact Data - includes billing address, delivery address, email address and telephone numbers.
 - (c) Financial Data - includes bank account and payment card details.
 - (d) Transaction Data - includes details about payments to and from you and other details of products and services you have purchased from us.
 - (e) Technical Data - includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
 - (f) Usage Data - includes information about how you use our website, products and services.

(g) Marketing and Communications Data - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

11. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.
12. We sometimes collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). In the course of providing legal services members of Chambers' may collect information about criminal convictions and offences.

If you fail to provide personal data

13. Where we need to collect personal data by law, or under the terms of a contract or agreement we have with you and you fail to provide that data when requested, we may not be able to perform the contract or agreement we have or are trying to enter into with you (for example, to provide you with legal services). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

14. We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact, Special Categories of Personal Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Cookies are pieces of data created when

you visit a site, and contain a unique, anonymous number. See our Cookies Policy [here](#) for more information.

Chambers also uses Google analytics: Google utilizes the data collected to track and examine the use of coramchambers.co.uk, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualise and personalise the ads of its own advertising network.

The lawful basis for processing your personal data

15. We will only use your personal data when the law allows us to. Most commonly, we may rely on one or more of the following legal bases:

- (a) where you have given consent to the processing of your personal data for one or more specific purposes;
- (b) where we need to perform the contract we are about to enter into or have entered into with you;
- (c) 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. Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting Us; and/or
- (d) where we need to comply with a legal or regulatory obligation. This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

16. When we process Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), we may rely on one or more of the following legal bases:

- (a) we have the explicit consent from you to process your data for one or more specific purposes;
- (b) the processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law insofar as it is authorised by law;

- (c) the processing is necessary to protect the vital interests of the data subject or another person;
- (d) the processing relates to personal data that has already been made public by you; and/or
- (e) the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

The purposes of our processing your personal data

17. The reason why we may need to process your personal data, and the purpose for us doing so could be for any of the following reasons:

- (a) because you have applied for a job advertised by Coram Chambers;
- (b) because you have applied for a pupillage with Coram Chambers;
- (c) because you have applied for a mini-pupillage with Coram Chambers;
- (d) because you wish to enquire about the services our members may be able to provide;
- (e) because you are instructing a member of Chambers and have been asked to provide, or you wish to provide, certain personal data so that it can be considered in the course of the member providing legal services to you/acting as arbitrator, expert determiner, early neutral evaluator or mediator;
- (f) because you are providing payment to one of our members whom you have instructed;
- (g) because you are currently instructing one of our members and need to contact them;
- (h) because you have an enquiry about Chambers' marketing events and you have provided your personal data as part of your enquiry;
- (i) because you wish to make a complaint about one of our members;
- (j) because you wish to sign-up and/or pay to attend one of Chambers' marketing events/seminars *etc.*;
- (k) because you have a general enquiry about the conference facilities Chambers' provides;
- (l) because you have allowed us to use cookies to distinguish you from other users of our website (see our Cookies Policy [here](#) for more information).

18. If you have any further questions about these purposes, or the legal basis upon which we process your data, please contact Chambers' Data Protection Manager using the details above.

Change of purpose

19. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact Us.
20. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
21. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

22. We may have to share your personal data with the following categories of people:
 - (a) the Clerks and other members of staff who are employed by Coram Chambers;
 - (b) courts or other tribunals to whom documents are presented;
 - (c) other parties and their legal representatives in any proceedings to which your instructions relate;
 - (d) potential witnesses, in particular experts;
 - (e) ombudsmen and regulatory authorities;
 - (f) current, past or prospective employers;
 - (g) education and examining bodies;
 - (h) business associates, professional advisers and trade bodies;
 - (i) other people with whom you give us your explicit consent on a case by case basis for us to share your personal data with, such as friends or family;
 - (j) the email provider that we use to communicate with you;
 - (k) members may have from time to time trainees called pupils or mini-pupils, or assistants such as paralegals, who assist them with their practice and with whom they may share your personal data. The pupils and mini-pupils are bound by written confidentiality obligations not to disclose any material about cases that a member may share with them. Members may also share your personal data with colleagues or other barristers when seeking informal advice about your case, and always do so on a confidential basis;
 - (l) an individual member may use other software and programmes from time to time to process your personal data—they will inform you if this is the case.

23. Coram Chambers has an agreement with an IT provider which manages Chambers' IT services, including email, and provides Chambers with secure servers to process and store the personal data that you provide to us. Chambers also uses Chambers Management Software which allows Clerks and Staff to manage members' diaries, store information relating to cases, and coordinate billing. Your personal data will also be stored on this system.
24. Under no circumstances will search terms entered by users, or search reports generated by users, be disclosed to any third party except where disclosure is required by law or is necessary for the performance of a search. Where terms are supplied to third parties (e.g. Google) to enable the performance of a search, they are not accompanied by any information which would enable that third party to identify the user/organisation who/which has submitted them.
25. 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.

26.

International transfers

27. Chambers may from time to time transfer your data to the EEA and other third countries which benefit from an 'Adequacy Decision' by the UK under regulations made under section 17A of the Data Protection Act 2018, or paragraphs 4 and 5 of Schedule 21 to the 2018 Act.
28. The personal data we process about you will on occasion be transferred outside of the UK to the USA. Examples are when we use Egress or Zoom. When this is the case, we will comply with the prevailing data protection laws in force to ensure such transfers are lawful by, for example, ensuring standard contractual clauses are in place governing relevant data transfers .
29. Personal data which you provide to us in the course of using our other services may be transferred to countries which do not benefit from a UK Adequacy Decision; for example, when instructing one of our members located abroad. Any such transfer of your personal data will be governed by the agreement we have in place with you to provide you with legal services (or any other services) and will comply with the prevailing data protection laws in force to ensure such transfers are lawful.

Data Security

30. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
31. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention—how long will you use my personal data for?

32. We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.
33. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
34. In some circumstances you can ask us to delete your data: see below for further information on the “right to erasure”.
35. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

36. Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:
 - (a) Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you

corrected, though we may need to verify the accuracy of the new data you provide to us.

- (c) Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for our continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request to erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (1) if you want us to establish the data's accuracy; (2) where our use of the data is unlawful but you do not want us to erase it; (3) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (4) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us by using the details provided above.

For more information about your rights in relation to the way in which we process your personal data, please see the following link: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

No fee usually required

37. 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

38. 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

39. 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.