

## Data Protection Policy

### Introduction

Farrington Legal Services is required to maintain certain personal data about living individuals for the purposes of satisfying operational and legal obligations. Farrington Legal Services recognises the importance of the correct and lawful treatment of personal data; it maintains confidence in the organisation and provides for successful operations.

The types of personal data that Farrington Legal Services may require include: current, past and prospective employees; suppliers, and customers with whom it communicates. The personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 2018

Farrington Legal Services fully endorses and adheres to the eight principles of the Data Protection Act. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation, and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for Farrington Legal Services must adhere to these principles.

### Principles

The principles require that personal data shall:

1. Be processed fairly and lawfully and shall not be processed unless certain conditions are met;
2. Be obtained for a specific and lawful purpose and shall not be processed in any manner incompatible with that purpose;
3. Be adequate, relevant and not excessive for those purposes;
4. Be accurate and, where necessary, kept up to date;
5. Not be kept for longer than is necessary for that purpose;

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6. Be processed in accordance with the data subject's rights;
7. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures;
8. And not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### Satisfaction of Principles

In order to meet the requirements of the principles, Farrington Legal Services will:

- Observe fully the conditions regarding the fair collection and use of personal data;
- Meet its obligations to specify the purposes for which personal data is used;
- Collect and process appropriate personal data only to the extent that it is needed to fulfil operational or any legal requirements;
- Ensure the quality of personal data used;
- Apply strict checks to determine the length of time personal data is held;
- Ensure that the rights of individuals about whom the personal data is held, can be fully exercised under the Act;
- Take the appropriate technical and organisational security measures to safeguard personal data;
- And ensure that personal data is not transferred abroad without suitable safeguards.

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### Designated Data Controller

**Peter Farrington** is Farrington Legal Services Information Compliance Manager and is responsible for ensuring compliance with the Data Protection Act 2018 and implementation of this policy on behalf of the firm.

Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with the Information Compliance Manager.

### Status of the Policy

This policy has been approved by the partners and any breach will be taken seriously and may result in formal action.

Any employee who considers that the policy has not been followed in respect of personal data about themselves should raise the matter with the Information Compliance Manager.

### Employee and Agent Responsibilities

All employees and agents are responsible for:

- Checking that any personal data that they provide to the company is accurate and up to date.
- Informing the company of any changes to information which they have provided, e.g change of address.
- Checking any information that the company may send out from time to time, giving details of information that is being kept and processed.

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# Farrington Legal Services

Investigators - Process Servers - Litigation Support - Enquiry Agents

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### Data Security

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted.

All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely.
- Personal information is not disclosed either orally or in writing or otherwise to any unauthorised third party.

### Retention of Data

Farrington Legal Services will keep some forms of information for longer than others. All staff are responsible for ensuring that information is not kept longer than necessary.

**Reviewed September 2020**

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