

SKO FAMILY LAW SPECIALISTS

WEBSITE PRIVACY NOTICE

SKO Family Ltd, trading as SKO Family Law Specialists (“**SKO**”) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how SKO collects and processes your personal data through your use of this website,

This website is not intended for children and we do not knowingly collect data relating to children via our website.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we 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 other notices and privacy policies and is not intended to override them.

CONTROLLER

SKO is the data controller and responsible for your personal data (collectively referred to as "the Firm", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

The Data Privacy Manager
SKO Family Law Specialists
18 George Street,
Edinburgh
EH2 2PF

T. 0131 322 6669
E. privacy@sko-family.co.uk

COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority in relation to any 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 consider contacting our Data Privacy Manager in the first instance. You can get in touch with us using any of the above contact details.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in August 2018.

This privacy notice is designed in line with the requirements of GDPR (the General Data Protection Regulation (EU) 2016/679) and the Data Protection Act 1998 (together "**Data Protection Legislation**"). 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.

If you would like us to update any of your personal data including contact information, please contact our Data Privacy Manager or alternatively email gareth.hughes@sko-family.co.uk.

2. THE DATA WE COLLECT ABOUT YOU

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows.

- **Contact Data** is the personal data you provide when you contact us.
- **Technical Data** this can include internet protocol (IP) address, your login data, 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.

We do not collect any **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). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us in person, by email, by phone, by post or otherwise. This includes personal data you provide when you give us feedback or contact us.
- **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 and other similar technologies. Please see our cookie section below for further details.
- **Third parties.** We may receive Technical Data from analytic providers as explained in our cookie section below.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Data Protection Legislation requires us to have a lawful basis for every processing activity that we perform. Most commonly, we will use your personal data in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you.
- 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.
- Where we need to **comply with a legal or regulatory obligation**.
- Where we have your **consent** to process your personal data.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA AND OUR LAWFUL BASIS

We have set out below, in a table format, a summary of: (i) the purpose for which we use your personal data; (ii) the categories of personal data that we collect; and (iii) our lawful basis for processing your personal data. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our [Data Privacy Manager](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Categories of Data	Lawful Basis
To respond to queries we receive	Contact Data	Legitimate interests (to respond to potential business inquiries) Consent
To personalise our website and improve user experience	Technical Data	Legitimate interests (to improve website interactions)

CHANGE OF PURPOSE

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 our [Data Privacy Manager](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

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.

COOKIES

A cookie is a text file containing a small amount of information that is sent to your browser when you visit a website. The cookie is then sent back to the originating website on each subsequent visit, or to another website that recognises it. Cookies are an extremely useful technology and do lots of different jobs.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. More information about the cookies we use is set out below.

Cookies generally fall into the following categories:

- **Strictly necessary cookies.** These are cookies that are required for the operation of a website (e.g. that enable you to log into secure areas of a site).
- **Analytical/performance cookies.** They allow web hosts to recognise and count the number of visitors and to see how visitors move around a website when they are using it. This helps improve the way a website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to a website. They enable personalisation of content for you (e.g. greet you by name and remember your preferences).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. This information can be used make a website and the advertising displayed on it more relevant to your interests.

We currently only use Google Analytics as an analytical cookie. This cookie is placed by Google and persists for a very short period. It tracks who visits the store and from where. Although it records data such as your geographic location, device, internet browser and operating system, none of this information personally identifies you to us. It also records your computer's IP address which could be used to identify you but Google to not grant us access to this.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may also have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Who?	Detail
Service Providers	Service providers acting as processors including web hosting and related services.
Professional Advisors	Professional advisors acting as processors, controllers or joint controllers including lawyers, legal counsel, mediators, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
Authorities	Authorities such as HM Revenue & Customs, regulators and other authorities acting as processors, controllers or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
Other third parties	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

- When personal data is shared with third parties service providers it is limited to that which is required for providing the service.
- We require all third party service providers 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 who are data processors 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.
- Where we instruct legal counsel on your behalf as a client, the legal counsel instructed will be acting as a controller, or joint controller with us, of the personal data which we require to disclose about you in relation to that instruction. As a controller in his/her own right, the legal counsel will have his/her own privacy notice which will be notified to you prior to his/her instruction.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside of the European Economic Area (EEA).

7. DATA SECURITY

The safety of your personal data is of utmost important to us. As such, we have put in place appropriate technical and organisational 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 will

only process your personal data on our instructions and on the basis that they are subject to a duty of confidentiality.

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.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

Below we set out the key retention periods. Further details can be obtained by contacting our [Data Privacy Manager](#).

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. This includes the following rights:

- **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.
- **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.
- **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 us 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 of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **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.
- **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase

it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **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.
- **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 our [Data Privacy Manager](mailto:gareth.hughes@sko-family.co.uk), gareth.hughes@sko-family.co.uk.

NO FEE USUALLY REQUIRED

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

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

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.