

WESTGATE CHAMBERS – PRIVACY POLICY

Contents

1	Who are we and what do we do?	2
2	Terminology	2
3	Personal data we collect.....	3
4	How your personal data is collected.....	5
5	How and why we use personal data.....	6
6	Marketing.....	10
7	Who we share your personal data with	11
8	Where your personal data is held	12
9	How long your personal data will be kept.....	12
10	Transferring your personal data abroad	13
11	Your rights	13
12	Keeping your personal data secure.....	15
13	How to complain	16
14	Changes to this privacy policy.....	16
15	Updating your personal data	17
16	How to contact us	17
17	Do you need extra help?	18

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and what to do if you have a complaint.

This privacy policy does not apply to any third party websites that may have links to our own website.

Clients of Westgate Chambers should read this policy alongside our general terms and conditions, which provide further information on confidentiality.

1 Who are we and what do we do?

- 1.1 Westgate Chambers Ltd, a company registered in England under number 055778437, whose registered office is at Westgate Chambers, Blenheim House, Lower Ground Floor, 120 Church Street, Brighton, East Sussex BN1 1UD which acts as a general service company that manages the administration of the barrister's chambers known as Westgate Chambers
- 1.2 We collect and use personal data in the course of providing our services. When we do so we must comply with the UK General Data Protection Regulation (UK GDPR). We must also comply with the EU General Data Protection Regulation (EU GDPR) in relation to any services we offer to individuals in the European Economic Area (EEA).
- 1.3 Our services and website are not aimed specifically at children, who are usually represented by their parents or guardians. If you are under 18 years of age and you want further information about how we might use your data, please contact us (see '**How to contact us**' at section 16).

Individual barristers who are Members of Westgate Chambers are themselves independent controllers of personal data.

2 Terminology

- 2.1 It would be helpful to explain some key terms used in this policy:

We, us, our	Westgate Chambers Limited, Westgate Chambers or Member of Chambers i.e. barrister
-------------	---

Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to
You, your	As the context dictates, our clients/users and individuals associated with them, contacts, suppliers and any individuals whose personal data we receive in the course of providing our services

3 Personal data we collect

- 3.1 We may collect or use information about you in the course of providing our service and to improve products and services for our clients.

Personal data we will collect	Personal data we may collect depending on the matter in which we are instructed
Your name, address and telephone number Information to enable us to check and verify your identity, e.g. your date of birth or passport details Gender and pronoun preferences Occupation Marital status Electronic contact details, e.g. your email address and mobile phone number Information relating to the matter in which you are	Your National Insurance and tax details Details of your professional online presence, e.g. LinkedIn profile Financial data/transaction data (including income and expenditure and details about payments to and from you and details of products and services you have purchased) Your financial details so far as relevant to your instructions, e.g. the source of your funds and source of wealth. Information to enable us to undertake a credit check or other financial checks on you Details of your spouse/partner and dependants or other family members/third parties.

Personal data we will collect	Personal data we may collect depending on the matter in which we are instructed
seeking our advice or representation Payment details (including card or bank information for transfers and direct debits) Information about how you interact with and use our website, products and services Audio recordings, e.g. calls Video recordings, e.g. of virtual meetings Records of meetings and decisions.	Your employment status and details including salary and benefits. Criminal records data, including driving or other convictions. Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information. Details of your pension arrangements. Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances. Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs. Information relating to sex life or sexual orientation. Your trade union membership and/or political opinions. Health information such as your medical records, or health conditions if relevant to your case. Genetic information and/or biometric information used to identify you.

- 3.2 The main purpose of collecting and using this information is to provide products and services to our clients. However, we may also collect and use the above information for the purposes set out in section 5.4.
- 3.3 If you do not provide personal data we ask for, it may delay or prevent us from providing those services.

4 How your personal data is collected

4.1 We collect most of the above information from you directly or via our instructing solicitors.

4.2 However, we may also collect information:

4.2.1 from publicly accessible sources, e.g. Companies House or HM Land Registry;

4.2.2 directly from a third party, e.g.:

- (a) sanctions screening providers;
- (b) credit reference agencies;
- (c) client due diligence providers;

4.2.3 from a third party with your consent, e.g.:

- (a) your bank or building society, another financial institution or advisor;
- (b) your legal advisor, employer and/or trade union, professional body or pension administrators;
- (c) your doctors, medical and occupational health professionals.

4.2.4 via our website—we use cookies and similar technologies on our website (for more information on cookies, please see our homepage:

www.westgate-chambers.co.uk

4.2.5 via our security, information technology (IT) systems, e.g.

- (a) via our case management, document management and time recording systems;
- (b) from door entry systems and reception logs;
- (c) through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

5 How and why we use personal data

5.1 Under data protection law, we can only use your personal data if we have a proper reason, e.g.

5.1.1 you have given consent—where we need your consent, we will ask for it separately and you can withdraw consent at any time;

5.1.2 to comply with our legal and regulatory obligations;

5.1.3 to fulfil our contract with you or take steps at your request before entering into a contract/taking instructions;

5.1.4 for the purposes of a recognised legitimate interest under UK data protection law; or

5.1.5 for our legitimate interests or those of a third party.

5.2 A recognised legitimate interest at section 5.1.4 is a pre-approved, public-interest purpose for processing personal data, e.g. detecting, investigating or preventing crime. A legitimate interest (at section 5.1.5) is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. This is not required if we rely on a recognised legitimate interest.

5.3 You have the right to object to processing based on a recognised legitimate interest or legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms or the processing is required to establish, exercise or defend legal claims. Such a request may have an impact on the legal services we provide.

5.4 The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to our clients	To fulfil our contract with clients or to take steps at their request before entering into a contract

What we use your personal data for	Our reasons
Preventing, detecting or investigating fraud (or other crimes) against you or us	Depending on the circumstances, for: —the recognised legitimate interest of preventing, detecting or investigating crimes —our and/or your legitimate interests, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our clients and verify their identity Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests
To check whether there is any conflict of interest between us and you and/or between you and another client	To comply with our legal and regulatory obligations
To enforce legal rights or defend or take legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests or those of a third party
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests
Ensuring internal business policies are complied with, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures so we can deliver the best service to our clients

What we use your personal data for	Our reasons
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to our clients at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: —for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information —to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, services range or other efficiency measures	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to our clients at the best price
Protecting the security of systems and data used to provide services, preventing unauthorised access and changes to our systems	Depending on the circumstances: —for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us —to comply with our legal and regulatory obligations
Updating client records	Depending on the circumstances: —to fulfil our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations —for our legitimate interests, e.g. making sure we can keep in touch with our clients about existing and new services
Statutory returns	To comply with our legal and regulatory obligations

What we use your personal data for	Our reasons
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Providing information updates and/or marketing our services to existing and former clients and third parties	Depending on the circumstances: —for our legitimate interests, i.e. to promote our business —consent (which you can withdraw at any time)
Credit reference checks via external credit reference agencies	For our legitimate interests, i.e. to ensure our clients are likely to be able to pay for our services
To deal with complaints or claims	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our or your legitimate interests, e.g. to make sure any potential claim is reported to our insurer
External audits and quality checks, e.g. for Information Commissioner's Office, Bar Standards Board and the audit of our accounts (to the extent not covered by 'activities necessary to comply with legal and regulatory obligations' above)	Depending on the circumstances: —for our legitimate interests, i.e. to achieve and maintain relevant accreditations so we can demonstrate we operate at the highest standards —to comply with our legal and regulatory obligations
Voluntarily sharing relevant personal data with public authorities, regulators or other bodies exercising official functions in response to written requests where we consider	For a recognised legitimate interest, namely, to respond to a request from another organisation that needs the personal data for the purposes of carrying out its task in the public

What we use your personal data for	Our reasons
disclosure is necessary and appropriate	interest or exercising its official authority
To consider and respond to job applications	Recognised legitimate interest for the purpose of recruiting barristers, pupils and administrative staff.

5.5 Where we process special category personal data (see section 2 ‘**Terminology**’), we will also ensure we are permitted to do so under data protection laws, e.g.

5.5.1 we have your explicit consent;

5.5.2 the processing is necessary to protect your (or someone else’s) vital interests where you are physically or legally incapable of giving consent;

5.5.3 the processing is necessary to establish, exercise or defend legal claims; or

5.5.4 the processing is necessary for reasons of substantial public interest.

6 Marketing

6.1 We may use your personal data to send you updates (e.g. by email, text message, telephone, post or social media channels) about our services, including exclusive offers, promotions or new services.

6.2 We have a legitimate interest in using your personal data for marketing purposes (see section 5 ‘**How and why we use your personal data**’). This means we do not usually need your consent to send you marketing information. Where this is not the case, we will always ask for your consent.

6.3 In all cases, you have the right to opt out of receiving marketing communications at any time by:

6.3.1 contacting us at clerks@westgate-chambers.co.uk or via our contact us form online: <https://westgate-chambers.co.uk/contact/>

6.4 We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

6.5 We will always treat your personal data with the utmost respect and never sell it to or share it with other organisations outside of Westgate Chambers for marketing purposes.

7 Who we share your personal data with

7.1 We routinely share personal data with:

7.1.1 instructing solicitors or solicitors instructed by Chambers;

7.1.2 third parties we use to help deliver our services, e.g. providers of our case management and finance system, IT service providers including cloud service providers such as data storage platforms, shared service centres and financial institutions in connection with invoicing and payments;

7.1.3 third party external advisors or experts engaged in the course of providing services, e.g. solicitors, accountants or tax advisors;

7.1.4 companies providing services for money laundering checks and other crime prevention purposes and companies providing similar services, including financial institutions and credit reference agencies;

7.1.5 other third parties we use to help promote our business, e.g. marketing agencies;

7.1.6 third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;

7.1.7 our insurers and brokers;

7.1.8 our bank;

7.1.9 third parties who assist in collating feedback and legal ranking services for example Legal 500.

7.2 We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We ensure all

outsourcing providers operate under service agreements that are consistent with our legal and professional obligations.

7.3 We or the third parties mentioned above may occasionally also share personal data with:

7.3.1 our external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations

7.3.2 our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations

7.3.3 law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations

7.4 If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' at section 16).

8 **Where your personal data is held**

8.1 Personal data may be held at our offices and third party agencies, service providers, representatives and agents as described in section 7 '**Who we share your personal data with**'.

8.2 Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this occurs, see section 10 '**Transferring your personal data abroad**'.

9 **How long your personal data will be kept**

9.1 We will not keep your personal data for longer than we need it for the purpose for which it was collected or as required by law.

9.2 As a general rule, we will keep your personal data for at least seven years from the conclusion of your matter to:-

9.2.1 in case you, or we, need to bring or defend any complaints or claims.

9.2.2 undertake conflict checks

9.2.3 prevent fraud

9.2.4 enforce our terms and conditions

9.2.5 keep records required by law.

9.3 Different retention periods apply for different types of personal data and for different services, e.g.:

9.3.1 where the matter involves a child, we will keep information for an appropriate period after the youngest child turns 18;

9.4 Following the end of the relevant retention period, we will delete or anonymise your personal data.

9.5 If you would like further information about how long we keep your personal data, please contact us (see '**How to contact us**' at section 16).

10 Transferring your personal data abroad

10.1 It is sometimes necessary for us to transfer your personal data to countries outside the UK. This may include countries which do not provide the same level of protection of personal data as the UK.

10.2 We will transfer your personal data outside the UK only where:

10.2.1 the UK government has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy regulation); or

10.2.2 there are appropriate safeguards in place (e.g. standard data protection clauses published or approved by the relevant data protection regulator), together with enforceable rights and effective legal remedies for you; or

10.2.3 a specific exception applies under data protection law.

10.3 For more information, please contact us using the '**How to contact us**' information at section 16:

11 Your rights

11.1 You have the following rights, which you can exercise free of charge. Further information can be found on the ICO's website: <https://www.ico.org.uk>

Access	You have the right to ask us for copies of your personal data. You can request other information such as where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for
Rectification	You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete
Erasure (also known as the right to be forgotten)	You have the right to ask us to delete your personal data—in certain situations
Restriction of processing	You have the right to ask us to limit how we use your personal data—in certain situations, e.g. if you contest the accuracy of the data
Data portability	You have the right to ask that we transfer the personal data you gave us to another organisation or to you—in certain situations
To object	You have the right to object: —at any time to your personal data being processed for direct marketing (including profiling) —in certain other situations to our continued processing of your personal data, e.g. processing carried out for our legitimate interests or a recognised legitimate interest condition under UK data protection law unless we demonstrate compelling legitimate grounds for the processing which override your interests or for establishing, exercising or defending legal claims
Rights in respect of automated decision making	Where significant decisions (those which produce a legal or similarly significant effect on you) are made using your personal data and based on solely automated processing with no meaningful human involvement, you have the right to have certain safeguards in place to protect your data subject rights, freedoms and legitimate interests. These safeguards include giving you information about the decision and enabling you to make representations, obtain human intervention and contest the decision. In addition, significant decisions made using special category personal data and based on solely automated

	processing are only allowed in certain specified scenarios, e.g. where you have given your explicit consent for the decision to be made using such data.
The right to withdraw consent	When we use your consent as our lawful basis, you have the right to withdraw that consent at any time You may withdraw consents by notifying the instructed member of chambers in writing by email or letter. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn. If you do withdraw consent it may impact the legal services we can and are providing to you.

11.2 If you would like to exercise any of those rights, please:

11.2.1 email, call or write to us—see section 16 ‘**How to contact us**’; and

11.2.2 provide enough information to identify yourself, including your full name, address and any additional identity information we may reasonably request from you;

11.2.3 let us know what right you want to exercise and the information to which your request relates.

11.3 We will not charge you for exercising your right to access your personal data. However, we reserve the right to make a charge if the request is unreasonable, repetitive or excessive. Alternatively, if we have reasonable grounds we can refuse to comply with your request.

11.4 We have one month to comply with your request and usually we are able to meet these time lines. It can sometimes take us longer if the request is particularly complex and we will notify you if that is the case and keep you updated.

12 Keeping your personal data secure

12.1 We have implemented appropriate technical and organisational measures to keep your personal data confidential and secure from unauthorised access, use and disclosure. We limit access to your personal data to those who have a

genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

- 12.2 We require our business partners, suppliers and other third parties to implement appropriate security measures to protect personal data from unauthorised access, use and disclosure.
- 12.3 We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are required to do so.

13 How to complain

- 13.1 We acknowledge that we may not always get things right, so if something has gone wrong, we need you to tell us. You have the right to make a complaint to us and our complaints procedure can be found [here](#). We hope we will be able to resolve any issues you may have.
- 13.2 If we are unable to resolve your complaint, you may also have the right to lodge a complaint with the Information Commissioner's Office (the UK data protection regulator, also known as the ICO). The ICO's contact details are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

14 Changes to this privacy policy

- 14.1 This privacy policy was last updated on 31.07.26
- 14.2 We may change this privacy policy from time to time. When we do, we will publish the updated version on our website and ask for your consent to the changes if legally required.

15 Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, e.g. your surname or address—see ‘**How to contact us**’ at section 16.

16 How to contact us

You can contact Westgate Chambers by post, email, web page contact form or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Westgate Chambers

Blenheim House

Lower Ground Floor

120 Church Street

Brighton

East Sussex

BN1 1UD

Tel. 01273 480510

Email. clerks@westgate-chambers.co.uk

<https://westgate-chambers.co.uk/contact/>

17 Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us—see ‘**How to contact us**’ at section 16.

- End Document -

Reviewed 07.09.26