

Privacy Notice

Caverley Lightfoot solicitors (“we”/”us”) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.caverleylightfoot.com you are accepting and consenting to the practices described in this policy.

For the purpose of the Privacy and Electronic Communications Regulations, UK General Data Protection Regulation, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 (“GDPR”) the data controller is Caverley Lightfoot Limited (Company Number 11157995) trading as Caverley Lightfoot of One St. Peter’s Road, Maidenhead, Berkshire SL6 7QU.

Information we collect from you

We will collect and process the following data about you:

Information you give us

This is information about you that you give us by filling in forms on our site www.caverleylightfoot.com or any other site managed or controlled by us (“our site”) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you search for a service, search for general information about us, make an enquiry via our site, enter a competition, promotion or survey or subscribe to our newsletter and when you report a problem with our site. The information you give us may include your name, address, other information about your property, e-mail address and phone number, financial and credit card information.

Information we collect about you

We may collect and process information relating to you in order to provide our services to you. We shall process any information we collect in accordance with Data Protection Legislation and the provisions of this Policy.

The information referred to above includes personal data, which means information that can be used to identify a natural person, including (but not limited to) the following types of personal information:

- contact information, such as an individual’s home or work address and contact details (including mobile telephone number)
- date of birth, marital/civil partnership status, details of dependants and next of kin
- financial information (including bank details, tax rates and information in relation to investments)
- employment status
- information about an individual’s professional qualifications

- pay records and national insurance number
- other information about an individual that you or they disclose to us when communicating with us
- details of any complaints or concerns raised by you or them
- information we obtain from the instructions you give to us

Some of the information that we collect about you and may include special categories of personal data (such as information about racial or ethnic origin, criminal or alleged criminal offences or health and lifestyle). We will usually seek separate permission from you or them in writing to process these special categories of personal data.

If you fail to provide us with this information, or you or object to us processing such information the consequences are that we may be prevented from providing our services to you or continuing to manage your matter(s) with us.

Regarding each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platforms and payment/bank details
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number. See our cookies policy for more information about this and the log data and other technical information we collect.

Information we receive from other sources

We work with third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, communication providers, marketing providers, analytics providers, search information providers and credit reference agencies. We will notify you when we receive information about you from them and the purposes for which we intend to use that information if we intend to use that information other than to carry out our obligations arising from any contract entered into between you and us.

To confirm your identity, we may supply some of your personal information to third parties to process Identity Verification and Anti-Money Laundering checks such as credit risk and affordability checking, fraud prevention, anti-money laundering, identity verification and tracing.

Nothing in this privacy policy is intended to prejudice or affect our obligations of confidentiality to our clients under the Solicitors Regulatory Authority (SRA) Code of Conduct or the principles of Legal Professional Privilege.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our cookies policy. A list of links to third-party privacy policies can be found on the cookies policy page, detailing how any third-party services may use your information.

Analytics and Functional Cookies Without Consent

Certain cookies used solely for service improvement, security, or audience measurement may be set without consent under the Data (Use and Access) Act 2025.

Uses made of the information

We use information held about you in the following ways:

- Information you give to us, whether on-line or off-line.
We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
 - to notify you about changes to our service;
 - to ensure that content from our site is presented in the most effective manner for you and for your computer.

Marketing communications

We may use your personal data to contact you with information about our legal services, updates, insights, events, or information which we believe may be relevant or of interest to you.

We will only do this where:

- you are a current or former client of the firm; or
- the communications relate to services similar to those you have previously received or enquired about; or
- you have otherwise indicated that you are happy to receive such communications.

You can opt out of receiving marketing communications at any time by clicking the unsubscribe link included in our emails or by contacting us using the details set out below.

- **Information we collect about you**
We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of our advertising and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

- **Information we receive from other sources**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive) and to carry out our obligations arising from any contract entered into between you and us.

Disclosure of your information

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 or any business with whom we are in partnership.
- Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with you
 - our marketing providers and website agency to help our marketing providers reach the kind of audience we want to target;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site. For more information about this, see our cookies policy;
 - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
 - Payment processors
 - Organisations to process identity verification and anti-money laundering checks
 - Cloud providers
 - Other delivery providers

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets who are also solicitors under obligations of confidentiality to us.
- If we or any subsidiary or holding company of us or substantially all of its or their assets are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets if those clients consent to such transfer of personal data.
- In connection with any audit of our accounts or files or in connection with obtaining legal or other professional advice from advisers who are under obligations of confidentiality to us.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of us, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, compliance with money laundering rules and credit risk reduction.

Third Party Contractors and other Controllers

- We may share your personal data with third parties where necessary to provide our services and operate our business. These may include IT and case-management providers, document management services, professional advisors, barristers, experts, courts, public bodies, regulators, auditors and other third parties involved in your matter. Where we do so, we carry out appropriate due diligence to ensure that contractual and regulatory safeguards are in place to protect your personal data.
- Telephone conversations to and from us may be recorded for training, monitoring and record-keeping purposes. The caller consents to such recording taking place and any recording or transcript of that recording being admissible as evidence in any suit, action or proceeding relating to the Agreement or a Support Document.

Storage of your personal data

All information you provide to us is stored and processed on our secure servers provided by our service providers in the UK.

We reserve the right to transfer the data that we collect from you or about you to be stored at a destination outside the European Economic Area ("EEA") where it will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and the GDPR.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

To comply with our tax obligations and our contractual obligations to our insurers we may retain some or all of the personal data we hold about you for up to seven years.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. You can exercise this right at any time by using the unsubscribe link included in our emails or by contacting us using the details below. .

You also have the right to

- access the data we hold about you,
- for any data we hold about you to be rectified,
- in some circumstances for any data we hold about you to be erased,
- to request that we restrict the way in which we process the data we hold about you,
- require us to transfer any data we hold about you to you
- to withdraw, at any time, any consent that you have previously given to us for our use of your personal data
- to ask us to transfer a copy of your personal data to another party where technically feasible and otherwise required by applicable regulations
- to request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data
- complain directly to us as controller of your data, which you can exercise if you believe we have infringed UK data protection rules. This is in addition to your right to complain to the Information Commission (see further, below)

Any request for access to or a copy of personal data must be in writing, and we will endeavour to respond within a reasonable period and in any event within one calendar month in compliance with Data Protection legislation. We will comply with our legal obligations as regards any individual's rights as a data subject.

We may refuse or charge a reasonable fee for requests that are "vexatious or excessive", including repeated requests, requests made in bad faith, or requests that impose a disproportionate burden.

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise this right or any of your other rights at any time by contacting Katie Lightfoot at One St Peter's Road, Maidenhead, Berkshire SL6 7QU katie@caverleylightfoot.com

Our site may, from time to time, contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Data Protection Complaints Handling Procedure

1. Purpose of this Procedure

This procedure explains how individuals can raise concerns about the Firm's handling of personal data and how the Firm will respond. It ensures compliance with the Data (Use and Access) Act 2025, the Data Protection Act 2018 and the UK GDPR.

2. Scope

This procedure applies to all personal data processed by the Firm, including data relating to clients, prospective clients, employees, contractors, and third parties.

3. How to Make a Data Protection Complaint

Individuals may submit a complaint using any of the following methods:

- Email: katie@caverleylightfoot.com
- Post: One St Peter's Road, Maidenhead, Berkshire SL6 7QU
- Telephone: 01628 873442
- In person: please ask for Katie Lightfoot

Complaints should include:

- The individual's name and contact details
- Details of the issue being complained about
- Any relevant evidence or supporting information

4. Acknowledgement of Complaints

The Firm will acknowledge receipt of the complaint within 5 working days.

5. Investigation Process

The Firm will:

- Review the complaint and any supporting evidence
- Identify the data, systems, or processes involved

- Interview relevant staff where necessary
- Assess whether the Firm has complied with data protection law

6. Response Timescales

The Firm will provide a substantive response within one month of receiving the complaint. If the complaint is complex, the Firm may extend this by up to two further months, informing the complainant of the extension and reasons.

7. Outcome of the Complaint

The Firm's response will include:

- A summary of the investigation
- Whether the complaint is upheld, partially upheld, or not upheld
- Any corrective actions taken
- Information about the individual's right to escalate the matter

8. Escalation to the Information Commission

If the individual is dissatisfied with the Firm's response, they may raise the matter with the Information Commission (IC). The Firm will provide the IC's contact details in the response.

9. Record-Keeping

The Firm will maintain a log of all complaints, including:

- Date received
- Nature of complaint
- Investigation steps
- Outcome
- Any remedial actions

Records will be retained for at least 3 years.

10. Responsibilities

- Senior Responsible Individual (SRI) or Data Protection Officer (DPO): oversees investigations and approves responses
- All staff: must cooperate with investigations and follow corrective actions

Automated Decision Making (ADM)

We may use automated systems to assist with certain decisions, such as identity verification, AML risk scoring, or conflict checks. Where a decision produces legal or similarly significant

effects, you have the right to request human review, express your point of view, and contest the decision.

Recognised Legitimate Interests

We may process personal data relying on “Recognised Legitimate Interests” as defined in the Data (Use and Access) Act 2025, including fraud prevention, network security, and safeguarding the public interest.

International Transfers

We assess international data transfers using the UK’s updated adequacy framework and appropriate safeguards.

Clarified Evidence Requirements

We may request additional information to verify identity where necessary and proportionate.

Updated Legal Basis

Where consent is required, we rely on your explicit consent. Where consent is not required, we rely on our legitimate interests in ensuring the security, performance, and improvement of our website.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. We keep this policy under regular review and will notify you of any material changes where appropriate. Please check this Privacy Notice periodically to inform yourself of any changes.

The Information Commission

Guidance about the GDPR and the rules about the collection, storage and use of personal data is provided on the website of the Information Commission at ico.org.uk who you can contact if you have any complaints about our website or our use of your personal data if we have not first been able to resolve any such complaint.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Katie Lightfoot at One St Peter’s Road, Maidenhead, Berkshire SL6 7QU
katie@caverleylightfoot.com

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