

Privacy and Data-Handling Policy - General Data Protection Regulation ("GDPR")

This document should be read alongside my Privacy Notice, which is also available on my professional webpage.

Commissioning data processing

My data processors will principally be St Philips Chambers Ltd and those engaged on its behalf, and those external persons or entities which St Philips Chambers Ltd has commissioned. My authorisation for Chambers' various acts as regards such processing comes from my membership of Chambers, and "binding legal act" (for GDPR purposes) of attachment to the constitution of Chambers. The constitution to which I am a signatory confers due authority on Chambers' management committee (comprised of company directors) and its employees and agents acting at that committee's behest and instruction.

I confirm that the duties and functions of St Philips Chambers Ltd are set out in the Chambers constitution and associated documents, to which I am a party, and signatory, as a member of Chambers. These include Chambers' own Privacy Notice and data protection documentation. The Privacy Notice and associated documents are detailed, and were produced with informed input. Together, complete with the training given to employees concerning GDPR issues, they represent the sufficient safeguards/guarantees for security which I, as data controller, must ensure any chosen processors provide for. They preclude the processing of data except under my instruction, and limit the numbers of employees who might be able to review the data which is to be processed. They represent appropriate technical and organisational measures for the protection of the data which is processed; and their safeguards/guarantees are at least as strong as those which I am committed to as controller. They detail what Chambers would do in the event of any breaches of its own when acting as data controller. Such procedures would be implemented by analogy if and when Chambers breached its governing principles of data security whilst processing for me. Similarly, those documents and the procedures they detail are at the core of Chambers' own regime for the commissioning of external agents. They thus represent the sufficient safeguard as regards the contracting of any sub-processors in respect of data for which I am controller.

In terms of St Philips Chambers Ltd as a processor, please note that its website contains cookies. Cookies are small text files that are stored on your browser or device by websites, apps etc. Chambers' website uses cookies to, for example, validate users, remember their preferences, record the amount of traffic and viewing of the website, and similar. The cookies collected do not generally contain information which would enable disclosure of your personal data, as Chambers' own Privacy Notice indicates. The only exemptions from this general position are as identified within that Privacy Notice. They concern instances, in particular, when you post a comment on a blog post or a social media site published or maintained by Chambers, or when you sign up to receive marketing information from Chambers.

How will I ensure, during the periods both of (i) initial processing; and (ii) of retention afterwards, that the general principles of minimisation and security, etc. are maintained?

- I will keep a record of my data controlling and processing activities, within the meaning of regulation 30 GDPR (see below).
- I will maintain awareness of the types of data I am liable to control the processing of. Such data might well include:
 - (i) Names, dates of birth and addresses
 - (ii) Bank details and financial details
 - (iii) Indications of current or past mental or physical health (sensitive)
 - (iv) Any criminal convictions or sentences (sensitive)
 - (v) Employment or qualifications history
 - (vi) Allegations made against them
 - (vii) Details of race, ethnic origin or religious background (sensitive)
- I will keep my policy and Privacy Notice under review, having regard to any necessary updates and changes. I will bear in mind my stated purposes for the processing of data as a means of ensuring minimisation of such processing. I will consider the extent to which anonymisation or reduction may take place, particularly as regards data to be shared for training or educational purposes or for reasons of personal legitimate interest beyond the usual retention period.
- During the periods of processing and retention, in accordance with the principles governing data control and minimisation within the GDPR and the Data Protection Act, I will:
 - (i) seek to minimise the storage and retention of data, such as by returning hardcopy materials to solicitors pursuant to examination of my filing storage at periodic intervals (twice a year on average), or by disposal of such data within a confidential waste bin. That way, typically only electronic or automatically stored data will be kept for the full retention period.
 - (ii) see to it that electronically or automatically stored data, as kept on my Chambers intranet system, or on the hard-drives of my personal computers, will be subject to such periodic tidying and reorganisation. (In particular, this will include by the periodic double-deletion of emails which are older than the retention period, subject to any retained because of the review process).
 - (iii) to the greatest extent practicable, keep hardcopy storage secure within periods of processing and retention. Nothing by way of hardcopy storage will be kept at home or outside of Chambers during the period of retention, and reasonable attempts will be made to ensure security of any such filed data kept at home during periods of processing (i.e. to support home-working).

- (iv) ensure that any mobile processing is undertaken in sensitive conditions – e.g. when on a train, only when a device is shielded from view or when it is not in ready view of other people.
- (v) encrypt devices storing data and/or subject them to more rigorous password/passcode requirements, and maintain regular and effective anti-viral software, to give security to automatically produced data.
- (vi) save further copies of stored data on separate devices at periodic intervals (such devices then to be stored with reasonable security), so as to reduce the risk of accidental or unauthorised erasure.

Record-keeping

Consistent with the obligation of record-keeping concerning my privacy and data-handling practices, records will be kept of the processes I undertake that are referred to in this policy, such as of the periodic review and reorganisation of stored personal data (including notably, on emails), or of responding to the exercise of rights by Data Subjects.

Breaches

In the event of any breach, I will comply with the procedures detailed within the GDPR and Data Protection Act, including (as may be necessary) self-reporting both to the Data Subject and regulatory authority. I will follow the process envisaged to be undertaken by Chambers in light of its data protection policies, subject to any adjustments which may be desirable.