

Christopher Miller - Privacy Notice

This privacy notice tells you what to expect me to do with your personal information.

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Contact details

Email - chris@chrismillercompliance.com

What information I collect, use, and why

I may collect or use the following information to **provide and improve services for clients**:

- Names and contact details
- Addresses
- Occupation
- Date of birth
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)

- Credit history and credit reference information
- Criminal records data (including driving or other convictions)
- Information relating to compliments or complaints
- Audio recordings (e.g. calls)
- Records of meetings and decisions
- Account access information
- Website user information

I may collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes:**

- Names and contact information
- Client accounts and records
- Call recordings
- Financial information e.g. for fraud prevention or detection
- Biometric information (where used to identify someone)

I may collect or use the following personal information for **information updates or marketing purposes:**

- Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

I may collect or use the following personal information for **research or archiving purposes:**

- Names and contact details
- Addresses
- Purchase or client account history
- Website and app user journey information
- IP addresses
- Biometric information (where used to identify someone)

I may collect or use the following personal information to **comply with legal and/or regulatory requirements**:

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations
- Criminal offence data
- Biometric information (where used to identify someone)

I may collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Call recordings
- Witness statements and contact details

- Photographs
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Correspondence
- Biometric information (where used to identify someone)

Lawful bases and data protection rights

Under UK data protection law, I must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the Information Commissioner’s (“ICO”) website.

Which lawful basis I rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask me for copies of your personal information. You can request other information such as details about where I get personal information from and who I share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this here.](#)
- **Your right to rectification** - You have the right to ask me to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this here.](#)
- **Your right to erasure** - You have the right to ask me to delete your personal information. [You can read more about this here.](#)
- **Your right to restriction of processing** - You have the right to ask me to limit how I can use your personal information. [You can read more about this here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this here.](#)
- **Your right to data portability** - You have the right to ask that I transfer the personal information you gave me to another organisation, or to you. [You can read more about this here.](#)
- **Your right to withdraw consent** – When I use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this here.](#)

If you make a request, I must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact me using the contact details at the top of this privacy notice.

My lawful basis for the collection and use of your data

My lawful basis for collecting or using personal information to **provide and improve services for clients** are:

- Consent - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – I have to collect or use the information so I can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – I have to collect or use your information so I can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – I'm collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. My legitimate interests are:

- To be able to give comprehensive and objective advice for the the benefit of clients.

- Public task – I have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as mine. All of your data protection rights may apply, except the right to erasure and the right to portability.

My lawful basis for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:

- Consent - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – I have to collect or use the information so I can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – I have to collect or use your information so I can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – I am collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. My legitimate interests are:
 - To be able to give comprehensive and objective advice for your benefit especially in relation to your actual or potential involvement in crimes
- Public task – I have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as mine. All of your data protection rights may apply, except the right to erasure and the right to portability.

My lawful basis for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – I have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – I'm collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- To update clients on developments in the law

My lawful basis for collecting or using personal information for **research or archiving purposes**:

- Consent – I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – I have to collect or use the information so I can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – I'm collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To give you the best available advice on legislation, other statutory provisions and common law

My lawful basis for collecting or using personal information to **comply with legal requirements**:

- Consent - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – I have to collect or use the information so I can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – I have to collect or use your information so I can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – I am collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To assist you in ensuring you comply with your legal obligations

- Public task – I have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as mine. All of your data protection rights may apply, except the right to erasure and the right to portability.

My lawful basis for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – I have to collect or use the information so I can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – I have to collect or use your information so I can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – I am collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- To deal with complaints or claims in a fair manner

- Public task – I have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as mine. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where I get personal information from

- Directly from you
- Regulatory authorities
- Legal bodies or professionals (such as courts or other lawyers)
- Publicly available sources

- Credit reference agencies

How long I keep information

I will keep all information for a period based on the limitation period applicable for bringing claims against me in respect of any advice or any other legal services I undertake for you. This to ensure that I preserve evidence relating to your matter to ensure that a court has full information and to enable me to put forward my defence. The combined effect of the primary and secondary limitation periods is to restrict action against me for a period of up to 15 years running from the date that your right to take action arose. As ordinarily you would have 1 year from the date of issuing court action formally to serve proceedings on me, I will keep all information for 16 years.

How to complain

If you have any concerns about my use of your personal data, you can make a complaint to me using the my formal Complaints Procedure which is available at chrismillercompliance.com and which should be sent using the contact details at the top of this privacy notice.

If you remain unhappy with how I've used your data after raising a complaint with me, you can also complain to the ICO.

The ICO's address:

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>