

**BLACKSTONE CHAMBERS LIMITED: EXTERNAL PRIVACY NOTICE**  
Last Updated 25th May 2018

**This privacy notice**

1. We respect the privacy of every person who engages with us or Members of Blackstone Chambers to use the services that Blackstone Chambers or Members provide (our “**Services**”). We also respect the privacy of every person:
  - a. whose personal information we may process as a result of providing the Services to others; or
  - b. who applies to work at Blackstone Chambers (either to be engaged by Blackstone Chambers Limited (“**BCL**”) or as a mini-pupil, pupil or barrister); or
  - c. who visits or registers with [www.blackstonechambers.com](http://www.blackstonechambers.com) (the “**Site**”) and we are further committed to ensuring a safe online experience; or
  - d. who uses the services that we make available from the Site.

**Purpose of this privacy notice**

2. This notice (“**Privacy Notice**”) explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Notice also sets out your rights in respect of our processing of your personal information.
3. This Privacy Notice will inform you of the nature of the personal information that we process about you and how you can request that we delete, update, transfer and/or provide you with access to it. It is intended to assist you in making informed decisions when using our Services and the Site and/or to understand how your personal information may be processed by us as a result of providing the Services to others or when you apply to work at Blackstone Chambers. Please take a moment to read and understand it.
4. Please also note that this Privacy Notice only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties who are not joint controllers of the data with us.

**Who are we and what do we do?**

5. Our Services are supplied either by BCL or by Members of Chambers and the Site is operated by BCL, (collectively “**we**”, “**us**” or “**our**”).

6. BCL is the data controller responsible for your personal information processed via engagement with our Services and the Site.

BCL is a company incorporated under the laws of England and Wales with registered company number: 03526717 and whose registered office is at Wilmington House, High Street, East Grinstead, West Sussex, RH19 3AU.

Please note also that this Privacy Notice applies to barristers whose practices are part of Blackstone Chambers and who themselves are data controllers. A list of all current members of Blackstone Chambers can be found here:

<https://www.blackstonechambers.com/barristers/>.

Where we refer to Blackstone Chambers only, please understand this to mean a reference also to Members of Blackstone Chambers and/or BCL as appropriate.

## How to contact us

7. If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:
  - sending an e-mail to [privacy@blackstonechambers.com](mailto:privacy@blackstonechambers.com) marked for the attention of the Chambers Director or
  - calling us on (+44) 207 583 1770 to speak to either the Chambers Director or the Chambers Deputy Director

## What personal information do we collect and how do we use it?

8. Our primary goal in collecting personal information from you is likely to be to: (i) verify your identity; (ii) help us and our Members of Chambers deliver our Services; (iii) improve, develop and market new Services; (iv) carry out requests made by you in relation to our Services or on the Site; (v) investigate or settle inquiries or disputes; (vi) comply with any applicable law, court order, other judicial process, or the requirements of a regulator; (vii) enforce our agreements with you; (viii) protect the rights, property or safety of us or third parties, including our other clients and users of our Services or the Site; (ix) provide support for the provision of our Services; (x) recruitment purposes; and (xi) use as otherwise required or permitted by law.
9. To undertake these goals we may process the following personal information:
10. If you are a visitor to the Site:
  - Name and job title.
  - Contact information including email address.
  - Other information relevant to provision of our Services.
11. If you are an **individual client** in receipt of our and/or our Members of Chambers' Services or a **prospective individual client or are making an enquiry**:
  - Name and job title.
  - Contact information including email address.
  - Payment information.
  - Other information relevant to provision of our Services.
  - Information that you provide to us as part of our and/or our members providing the Services to you.
  - Relevant information as required by regulatory Know Your Client and or Anti Money Laundering regulations. This may possibly include evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with clients, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from the prospective client or through the use of online sources or both.
12. Primarily Blackstone Chambers is engaged by corporate instructors (i.e. other corporate entities) and as such those instructors are not data subjects. However, as part of such instructions, personal information about other persons may be provided to us and/or our Members directly (e.g. personal information relating, without limitation, to any of our and/or our Members' corporate clients' or prospective clients' workers, any opponent or potential opponent or witness or vendor or purchaser's personal information, including personal information relating to their legal advisors or workers as relevant or similar).
13. If you are an individual whose personal information may be processed by us and/or our Members as a result of providing the Services to others (including individual clients and

corporate clients) we and/or our Members will process a variety of types of personal information depending on the Services provided.

This may include personal information relating, without limitation, to any of our and/or our Members' corporate clients' or prospective clients' workers; any opponent or potential opponent or witness or any other person whose information is relevant or potentially relevant to the provision of Services; the vendor or purchaser's personal information, including personal information relating to their legal advisors or workers as relevant or similar.

We may obtain this data from various sources including clients and sources associated with clients, solicitors, witnesses or potential witnesses, and in some cases publicly accessible sources.

We and/or our Members might also need to process personal information in relation to other third parties instructed either by our and/or our Members' own clients or other persons or companies involved with us and/or our members providing the Services to our client (for instance other law firms, experts etc.).

14. If you are a **potential recruit** to Blackstone Chambers:

- Name and job title.
- Contact information including email address.
- Curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us.
- Other information relevant to potential recruitment to Blackstone Chambers.

15. In particular we may use your personal information for the following purposes:

**Fulfilment of Services.**

We and/or our Members collect, maintain and process personal information that you voluntarily submit to us and/or our Members during your use of our Services and/or the Site to enable us and/or our Members to perform the Services. Please note also that our Terms of Business also apply when we/our members provide the Services. These can be found on the Site. We and/or our Members also collect, maintain and process personal information on other individuals as a result of providing Services to others.

**Who do we share your personal information with for this purpose?**

We and/or our Members may share personal information with a variety of the following categories of third parties as necessary when providing the Services or carrying out the other functions set out below:

- Clients
- Arbitrators
- Solicitors
- Adjudicators
- Mediators
- Clerks & other BCL employees
- Pupils, mini-pupils and work shadow students
- Agents and contracts working for BCL
- Witnesses and potential witnesses
- Third party funders
- Costs draftsmen
- Insurers
- Ombudsmen, Regulators/tax authorities/corporate registries
- Other Counsel

- Court
- Opposing party and other parties to litigation, including their lawyers
- Translators
- Document review platforms
- Transcribers
- Process Servers
- Couriers
- Experts (for example foreign law, tax, medical, accountant, surveyors, valuers)
- Family and associates of clients
- Employers or prospective employers

Please note this list is non-exhaustive and there may be other examples where we and/or our Members need to share with other parties.

#### **What is our legal basis?**

It is necessary for us and/or our members to use your personal information to perform our and/or our Members' obligations in accordance with any contract that we and/or our members may have with you or it is in our and/or our members' legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we and/or our members provide the Services in the best way that we can as well as to carry out other functions such as for example training pupils, responding to complaints or for the purposes of any legal proceedings. Where information is in the special categories of information, the basis for processing such information for our and/or our Members of Chambers is also that it is necessary for the purpose of or in connection with legal proceedings including prospective legal proceedings, obtaining legal advice or otherwise necessary for the purpose of establishing, exercising or defending legal rights. The special categories of information include information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data or biometric data for the purpose of identifying a person, health or sex life or sexual orientation, and information relating to criminal convictions or offences or related security measures.

#### **Client services.**

Our Site uses various user interfaces to allow you to request information about our Services: these include printed and electronic enquiry forms and a telephone enquiry service. Contact information may be requested in each case, together with details of other personal information that is relevant to your Services enquiry. This information is used in order to enable us to respond to your requests.

#### **Who do we share your personal information with for this purpose?**

We would only share your personal information with third party contractors working for us in relation to our website.

#### **What is our legal basis?**

It is in our and/or our Members' legitimate interest or a third party's legitimate interest to use your personal information in such a way to ensure that we and/or our Members provide the very best client service we can to you or others.

#### **Your feedback about our Services.**

From time to time we will contact you to invite you to provide feedback about our and/or our Members' Services, either online or by post. We use this information to help us improve the quality of service provided by us and/or our members. We also use your feedback to monitor the quality of our Services.

**Who do we share your personal information with for these purposes?**

We may use a third party service provider to assist us with client surveys and feedback requests.

Where a third party provider is located outside the European Economic Area ('EEA') we will take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK/EEA data privacy laws.

**What is our legal basis?**

It is in our and/or our Members' legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

**Business administration and legal compliance.**

We and/or our Members use your personal information for the following business administration and legal compliance purposes:

- to comply with our and/or our Members legal obligations (including any Bar Council and/or Bar Standards Board or relevant legal service provider regulator, Know Your Client or Anti-Money Laundering or Anti-Bribery or similar obligations including, but without limitation, maintaining regulatory insurance);
- to enforce our and/or our Members' legal rights; and
- to protect rights of third parties; and

**Who do we share your personal information with for these purposes?**

We will share your personal information with professional advisers such as lawyers and accountants and/or appropriate governmental or regulatory authorities.

**What is our legal basis?**

Where we and/or our Members use your personal information to enforce our and/or our Members' legal rights, or to protect the rights of third parties it is in our and/or our Members' or a third party's legitimate interests to do so. For all other purposes described in this section, it is our and/or our Members' legal obligation to use your personal information to comply with any legal obligations imposed upon us and/or our Members. Where the information is special category personal data processing is also necessary for the purpose of or in connection with legal proceedings including prospective legal proceedings, obtaining legal advice, or otherwise necessary for the purpose of establishing, exercising or defending legal rights.

**Recruitment.**

We and/or our Members use your personal information for the following recruitment purposes:

- To assess your suitability for any position for which you may apply at Blackstone Chambers including barrister positions, pupillage positions, mini-pupillage and also any business support or services role, whether such application has been received by us online, by email, by hard copy, via a third party recruiter or in person.
- To review Blackstone Chambers' equal opportunity profile in accordance with applicable legislation and demonstrate that Blackstone Chambers does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit.

**Who do we share your personal information with for these purposes?**

We will only share your personal data for the purposes specified in this Privacy Notice and on the basis that it will be kept confidential and only used for the reasons described.

**What is our legal basis?**

Where we and/or our Members use your personal information in connection with recruitment, it will be in connection with us and/or our Members taking steps at your request to enter a contract we may have with you or it is in our legitimate interests to use personal information in such a way to ensure that we and/or our members can make the best recruitment decisions for Blackstone Chambers. We and/or our Members will not process any special category data except where we are able to do so under applicable legislation or with your explicit consent.

**Client insight and analysis.**

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Site, or from your mobile. This includes the following:

- an IP address to monitor Site traffic and volume;
- a session ID to track usage statistics on our Site;

Our web pages and e-mails contain “cookies” “web beacons” or “pixel tags” (“**Tags**”). Tags allow us to track receipt of an e-mail to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag. In some of our e-mail messages, we use a “click-through URL” linked to certain websites administered by us or on our behalf.

Please see our [Cookie Notice](#) for further information.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Site and our Services. This allows us to learn what pages of our Site are most attractive to our visitors, which parts of our Site are the most interesting and what kind of information our registered users like to see.

We also use this information for marketing purposes (see the marketing section below for further details).

**Who do we share your personal information with for these purposes?**

We share information about your visit to our site on an anonymised basis with Google Analytics to assist us with client insight analysis. Other providers (if any) are described in our [Cookie Notice](#).

**What is our legal basis?**

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our [Cookie Notice](#) for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best services to you and our other clients.

**Marketing communications**

We use information that we observe about you from your interactions with our Site, our email communications to you, our interactions with you on our other digital channels such as social media and/or with Services (see the Insight and Analysis section above for more

details of the information collected and how it is collected) and/or your address details, to provide information that we think will be of interest about us and our Services. For example, industry updates and insights, newsletters, invites to events and, where permitted by applicable law, promotional materials from BCL

#### **What is our legal basis?**

Where your personal data is not in an anonymous form, such as your email address, it is in our legitimate interest to use your personal data for marketing (via post and email).

We will only send you marketing communications via email where you have consented to receive such marketing communications or where we have an alternative lawful right to do so.

Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details.

#### **How do we obtain your consent?**

16. Where our and/or our Members' use of your personal information requires your consent, you can provide such consent:
- at the time we collect your personal information following the instructions provided; or
  - by informing us by e-mail, post or phone using the contact details set out in this Privacy Notice (see paragraph 7 above)

#### **Our use of cookies and similar technologies**

17. Our Site uses certain cookies, pixels, beacons, log files and other technologies of which you should be aware. **Please see our Cookie Notice** to find out more about the cookies we use and how to manage and delete cookies.

#### **Third Party contractors and other controllers**

18. As mentioned above, we and/or our members may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, fulfilment houses for postal marketing or Google Analytics who will process personal information on our behalf and at our direction. We and/or our members conduct an appropriate level of due diligence and put in place necessary contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.
19. Further, we and/or our members may appoint external data controllers in common where necessary to deliver the Services (for example, but without limitation, solicitors, other barristers or other third party experts). When doing so we and/or our Members will comply with our legal and regulatory obligations in relation to the personal information including, but without limitation, where necessary putting appropriate safeguards in place to ensure any personal information is processed according to our legal and regulatory obligations.

#### **Extra-EEA Transfers**

20. If you are based within the EEA, please note that where necessary to deliver the Services we and/or our Members may transfer personal information to countries outside the EEA. When doing so we and/or our Members will comply with our legal and regulatory obligations in relation to the personal information including, but without limitation, having a

lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

### **How long do we keep your personal information for?**

21. Regarding visitors to the Site, we will retain relevant personal information for at least three years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world) (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations).
22. Regarding personal information we have processed as a result of providing the Services to any client or other activity, we and/or our Members will in general retain relevant personal data for up to 16 years from the date of our last interaction with that client and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world) or for longer in certain cases if we and/or our Members consider it is necessary to do for the purpose of a legitimate interest for example for the purpose of any prospective legal proceedings or complaint, or are required to do so according to our regulatory obligations or professional indemnity obligations. We may then destroy such files without further notice or liability. Where the information is special category personal data it is also necessary to process such information for the purpose of or in connection with legal proceedings including prospective legal proceedings, obtaining legal advice or otherwise necessary for the purpose of establishing, exercising or defending legal rights. If you request your files and documents we may charge you for the costs of copying a duplicate.
23. If personal information is only useful for a short period e.g. for specific marketing campaigns we may delete it well before the time periods set out above.

### **Confidentiality and security of your personal information**

24. We and/or our Members are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.  
We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:
  - unauthorised access;
  - improper use or disclosure;
  - unauthorised modification; and
  - unlawful destruction or accidental loss.

All of our Members, employees, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the Site and all users of our Services.

### **How to access your information and your other rights**

25. You have the following rights in relation to the personal information we hold about you:
  - **Your right of access.**  
If you ask us, we will where you are entitled to this under the GDPR and other relevant legislation confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If



you require additional copies, we may need to charge a reasonable fee.

- **Your right to rectification.**

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to erasure.**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and we have shared your personal information with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.
- **Your right to restrict processing.**

You can ask us to "block" or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and we have shared your personal information with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.
- **Your right to data portability.**

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Your right to object.**

You can ask us to stop processing your personal information, and we will do so, if we are:

  - relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
  - processing your personal information for direct marketing.
- **Your rights in relation to automated decision-making and profiling.**

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.
- **Your right to withdraw consent.**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- **Your right to lodge a complaint with the supervisory authority.**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

## Collection of information by third-party sites and sponsors

26. The Site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as Blackstone Chambers has no control over information that is submitted to, or collected by, these third parties.

#### **UK Data Protection Act 2018 Policy**

27. The UK Data Protection Act 2018 requires data controllers to have in place a "special category data processing policy" (Article 42 and Schedule 1 Part 4). This Privacy Notice (and any related documents governing how personal data should be processed at BCL) are to be regarded as BCL's "special category data processing policy" as required by applicable legislation.

#### **Changes to this Privacy Notice**

28. We may make changes to this Privacy Notice from time to time. To ensure that you are always aware of how we use your personal information, we will update this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements.

We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.

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**BLACKSTONE CHAMBERS LIMITED**  
**COOKIE POLICY**

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**Introduction**

1. We use cookies on our Website for identification and analysis purposes. By using the Website you have consented to the storing and accessing of cookies on your device.
2. This cookie policy (“Cookie Policy”) is intended to inform you how we use “cookies” and similar technologies and to assist you in making informed decisions when using our Website. Please take a moment to read and understand this Cookie Policy. This Cookie Policy should also be read in conjunction with our [Privacy Policy](#).
3. Cookies and similar technologies are very small text documents or pieces of code, which often include an anonymous unique identifier. When you visit a website or use a mobile application, a computer asks your computer or mobile device for permission to store this file on your computer or mobile device and access information from it. Information gathered through cookies may include the date and time of visits and how you are using our Website.
4. We use cookies as part of our Website and they are also used by some of our third party partners.
5. For more details on cookies and similar technologies please visit All About Cookies. For the purposes of the remaining sections of this Cookie Policy we will refer to all technologies using the above features as “cookies”.

**You consent to Blackstone Chambers Limited using cookies**

6. By continuing to use our Website, you are deemed to consent to our use of the cookies described in this Cookie Policy. If you do not consent to us using cookies then please read the next section.

**You can block cookies**

7. You can block the use of cookies by activating the relevant settings in your browser or by following the links below. For more information on cookie management and blocking cookies for a wide variety of browsers, visit [All About Cookies](#).

**What happens when you block cookies**

8. In order to use some parts of our Website you will need to accept cookies. If you choose to withhold consent, or subsequently block cookies, some aspects of our Website may not work properly and you may not be able to access all or part of our Website.

**What we do with cookies**

*Strictly Necessary Cookies*

9. We use cookies where they are essential for the operation of the Website, for example to remember that you are signed in to the Website.

*Session Cookies*

10. We use cookies to allow the Website to uniquely identify your browsing session on our Website, which allows us to coordinate this information with data from our Website server.

*Analytics*

11. We use “analytics” cookies. These, along with other information, allow us to calculate the aggregate number of people using the Website and which features of our Website are most popular.
12. We use this information to improve the Website. We do not generally store any Information that you provide to us in a cookie.

**More information**

13. The table below sets out more information about the individual cookies used in the Website and the purposes for which they are used:

Cookie Type	Purpose
<b>Session ID</b>	A session cookie is created when a user logs in to the site. This is destroyed when the user logs out.
<b>Shortlist</b>	This cookie is used to store selected 'shortlist' flagged content on the /barristers page
<b>Google Analytics</b>	<p>These cookies enable us to store information such as the time you visit our website, whether you have visited before and the website that you visited prior to visiting our website. They distinguish users but do not identify them.</p> <p><b>_ga</b></p> <p>This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. It is set to expire after 2 years by default,</p> <p><b>_gid</b></p> <p>A Google Universal analytics cookie. It is used to store <i>Session ID</i> and to group the entire session’s activity together for each user</p> <p>For more information about Google Analytics please see:  <a href="http://www.google.com/intl/en/analytics/privacyoverview.html">http://www.google.com/intl/en/analytics/privacyoverview.html</a></p>
<b>CSRF Token</b>	Standard practice for security purposes when submitting form data on the site

Last update: 25<sup>th</sup> May 2018