

## **Sebastian Cox**

### **Personal UK GDPR Privacy Policy**

**Please read the following information carefully.**

This privacy notice contains information about the information that may be collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who I share this information with, the security mechanisms I have put in place to protect your data and how to contact me in the event you need further information.

#### **Data controller**

As a barrister who provides legal services, I am also a data controller. I am a registered for these purposes and practice at Crucible Chambers, which is a set of barristers chambers that administers and provides business support to me as a member. I need to collect and hold personal information. This may be your personal data or information relating to other parties involved in your case. I will take all possible steps to protect personal information. I will ensure that I do not do anything in respect of it that may infringe your rights or undermine your trust. This privacy policy describes the information I may collect about you, how it is used and shared, and your rights regarding it.

I am registered with the Information Commissioner's Office (ICO) as a Data Controller for the personal data that I holds and which I process. My ICO registration number is **ZA508580**. If you need to contact me about your data or this privacy notice, you can reach me at [clerks@crucible.law](mailto:clerks@crucible.law) or on 0207 031 5310.

#### **Data collection and sources of information**

The vast majority of the information that I hold about you will be provided to or gathered by me in the course of your case or proceedings and/or proceedings in which you may be involved as a witness or in some other capacity.

In addition to collecting information from you, I may also collect information from third parties. This could include information obtained from:

- Your solicitors



- Other legal professionals, including solicitors and barristers and their associates, trainees and staff
- Experts and other witnesses
- Prosecution authorities
- Courts and tribunals
- Lay clients
- Family and associates of the person whose personal information I am processing
- In the event of a complaint being made, my Head of Chambers, other members of Chambers who deal with complaints, the Bar Standards Board, and the Legal Ombudsman
- Other regulatory authorities and bodies
- Current, past or prospective employers
- Education and examining bodies
- Business associates, professional advisers and trade bodies, e.g. the Bar Council
- The general public in relation to the publication of legal judgments and decisions of courts and tribunals
- Data processors, such as my Chambers staff, IT support staff, email providers, data storage providers
- Public sources, such as the press, public registers and law reports.

### **What data might I process about you?**

I collect and process both personal data and special categories of personal data as defined in the UK General Data Protection Regulations (the UK GDPR). This may include your:

- Name
- Email address
- Phone number
- Address
- Payment or bank details
- Date of birth
- Next of kin details
- Details pertaining to education and employment
- Information on your background & current circumstances
- Financial information.

Where relevant, I may also need to process special category personal data that reveals your:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership



- Genetic data
- Biometric data for the purpose of uniquely identifying a natural person
- Physical and/or mental health
- Sex life and sexual orientation.

I may also collect and process personal data relating to criminal convictions and offences, criminal proceedings, outcomes and sentences, and related security measures as well as other personal data relevant to my instructions to provide legal services, including data specific to the instructions in question.

### **The lawful bases I rely upon for processing your information**

The UK GDPR requires all organisations that process personal data to have a lawful basis for doing so. The lawful bases identified in the UK GDPR that I seek to rely upon are as follows:

- **Consent of the data subject** – where this is required, I will ensure that I have your specific consent for processing your data. You will also have the right to withdraw your consent at any time. Where you do so this will not affect the legality of data processing which had taken place prior to your withdrawal of consent.
- **Performance of a contract with the data subject or to take steps to enter into a contract.**
- **Compliance with a legal obligation** – to comply with various regulatory and professional obligations, e.g. maintaining a record of my cases as required by my regulator and maintaining accurate records in support of tax returns filed with HMRC.
- **The legitimate interests of my business or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.**

Examples of legitimate interests include:

- Where the data subject is a client of or in the service of the controller;
- Where processing is necessary in order to enable the provision of legal services and advice;
- Where processing is necessary to check for potential conflicts of interest in relation to future potential cases;
- Where processing is necessary in order to be able to respond to complaints or potential future complaints;
- Where processing is necessary to ensure network and information security, including preventing unauthorised access or to prevent fraud;
- For the purposes of practice management, accounting and debt recovery;



- For the completion of professional regulatory requirements; Processing for direct marketing purposes, to promote and market my services;
- For the purposes of supporting professional applications or submissions to professional directories; and
- Where processing is necessary for reporting threats to public security.

### **Special category processing**

I process special category data when:

- I have your explicit consent to do so; or
- It is necessary for the exercise or defence of legal claims or judicial acts.

### **Criminal data processing**

I process data relating to criminal offences where it is necessary for:

- The purpose of, or in connection with, any legal proceedings;
- The purpose of obtaining and / or providing legal advice; or
- The purposes of establishing, exercising or defending legal rights.

### **I use your information to:**

- Provide legal advice and representation;
- Assist in training pupils and mini pupils;
- Investigate and address your concerns;
- Communicate with you about news, updates and events;
- Investigate or address legal or regulatory proceedings relating to your use of my services, including making or responding to complaints or potential complaints or to deal with other regulatory issues connected to my professional role or as otherwise allowed by applicable law;
- Assist in any tendering or panel membership applications; Assist in any other applications for the purpose of professional development or career progression; Communicate legal updates and judgments to other legal professionals; For marketing purposes; Keep accounting records, recover debts and carry out office administration; Check for potential conflicts of interest in relation to future potential cases; Carry out anti-money laundering and terrorist financing checks as required by law; or As otherwise required or permitted by law.

### **I may share your personal data with:**

- Instructing solicitors or other lawyers involved in your case;



- Courts and tribunals;
- A pupil or mini pupil, under another barrister's training;
- Opposing counsel, for the purposes of progressing or resolving the case;
- Expert and other witnesses, for the purposes of progressing or resolving the case;
- Crucibles management and staff who provide administrative services, including data processors, such as Chambers IT support staff, email providers and data storage providers;
- The Bar Standards Board or legal advisors in the event of a dispute or other legal matter that concerns one of Crucible's members;
- Law enforcement officials, government authorities, or other third parties to meet any legal obligations placed on me and on me as a member of Crucible;
- Legal directories, for the purpose of professional development;
- Any relevant panel or tendering committee, for the purpose of professional development;
- Accountants and banking officials;
- Family and associates of the person whose personal information I am processing;
- In the event of any complaint, as a member of Crucible, and other members of Crucible who deal with complaints, the Bar Standards Board, other relevant regulators or arbitrators and / or the Legal Ombudsman;
- Third party funders of your legal fees where necessary to ensure the continuation of funding; and
- Any other party where I may ask you for consent, and you consent, to the sharing.

I may be required to provide your information to regulators, such as the Bar Standards Board, the Financial Conduct Authority or the Information Commissioner's Office. In the case of the Information Commissioner's Office, there is a risk that your information may lawfully be disclosed by them for the purpose of any other civil, criminal or regulatory proceedings, without my consent or yours, which includes privileged information.

I may also be required to disclose your information to the police or intelligence services, where, as stated, I am required or permitted to do so by the law.

### **Transfers to third countries and international organisations**

I do not intentionally transfer any personal data to third countries or international organisations except as is necessary for providing legal services or for any legal proceedings.



This privacy notice is of general application and as such it is not possible to state whether it will be necessary to transfer your information to third countries (including all EEA states) in any particular case. However, if you reside outside of the UK or your case involves courts, tribunals, funding parties or investigatory authorities outside of the UK, then it may be necessary to transfer some of your data to a third country for that purpose. If you are in a country outside the UK or if the instructions you provide come from outside the UK, then it is inevitable that information will be transferred to those countries. If this applies to you and you wish additional precautions to be taken in respect of your information, please indicate this when providing your initial instructions.

Should it become necessary that any of your personal data be transferred to third countries, I will seek your express prior consent for this to be done and will ensure that such transferred data is fully protected and safeguarded as required by the UK General Data Protection Regulation.

### **How I will store and retain your personal data**

I will limit the extent to which any personal data is held or stored in hard copy form to the minimum possible. I will usually store your information on a personal computer or another electronic device. Each device is encrypted, and password protected, with a minimum 9 character pass key to it. Where appropriate entry can be gained through biometric data such as my fingerprint or face recognition system with the device.

Data to which I have access and process may also be stored electronically on the Crown Court Digital Case System, on my chambers' diary / case management system and / or my chambers' email system. Each of these systems are subject to password and / or encryption protections.

Where your information is supplied to me on any form of independent electronic device such as an external hard drive, a CD Rom or USB stick I comply with my chambers policy on information, management and security. I keep a data log of such devices and when I receive new data on an external electronic source (other than attachments to email), I log the receipt of that data. The log will identify where that data will be stored once accessed or how it will be destroyed (once downloaded) or if it has been returned to you or the firm you have instructed. In accordance with my wider professional obligations under the BSB Code rC15.5 I will take all reasonable and necessary steps to ensure that your data is kept safe and confidential.

I will follow my chambers wider Information Management Policy, which includes protections afforded to data including the receipt and handling of physical papers. This policy is available on request.

### **How long I will retain your personal data for**



I will retain your personal data while you remain a client or while it remains necessary for me to retain it in order to comply with my legal and / or regulatory obligations as to the maintenance of business records. I will normally store all your personal data until at least 1 year after the expiry of any relevant minimum period set by my regulator or other authority for the retention of documentation. Examples of such periods are:

- Those set by my regulator in order to ensure that records of my dealings with your case are retained for a reasonable time for the purposes of any potential legal and/or regulatory proceedings (which may include appellant proceedings by you). The relevant period will usually be 6 years, but may be longer where the case includes information relating to a child or youth or someone who does not have the capacity to litigate themselves;
- Information related to anti-money laundering checks must by law be retained until five years after the completion of the transaction or the end of the business relationship, whichever is the later; and
- Information provided to HMRC in respect of annual accounts and tax records must be retained for a period of at least 6 years.

In each instance, the minimum period will be calculated by reference to the date when the last item of work was carried out, the date of the last payment being received or the date on which all outstanding payments are written off, whichever is the latest.

At least once a year, I will review the personal data which I retain. At the point of each review, any material in respect of which the relevant limitation period has expired and which no longer needs to be retained will be marked for deletion. A further retention period is likely to occur only where the information is needed for active legal proceedings, regulatory matters or complaints. Deletion will be carried out (without further notice to you) as soon as reasonably practicable after the data is marked for deletion.

Even where your personal data has been marked for deletion, however, I may continue to store some of your information in order to be able to carry out conflict checks for the rest of my career. However, this is likely to be limited to your name and contact details/ the name of the case/your company and any other parties' names and addresses that may be connected to your legal instruction. This will not include any special category information, as explained above.

Names and contact details held for marketing purposes will be stored indefinitely or until I or my clerks are informed or become aware that you as an individual or you as a firm have ceased to be a potential client.

## **Your rights**

The UK GDPR gives you specific rights in terms of your personal data. For example, you have to be informed about the information I hold and



what I use it for; you can ask for a copy of the personal information I hold about you; you can ask me to correct any inaccuracies with the personal data I hold, and you can ask me to stop sending you direct mail, or emails, or in some circumstances ask me to stop processing your details. Finally, if I do something irregular or improper with your personal data, you can seek compensation for any distress you are caused or loss you have incurred.

You can find out more information from the ICO's website:

[http://ico.org.uk/for\\_the\\_public/personal\\_information](http://ico.org.uk/for_the_public/personal_information)

### **Accessing and correcting your information**

You may request access to, correction of, or a copy of your information by contacting me at [clerks@crucible.law](mailto:clerks@crucible.law).

### **Complaints**

If you are unhappy either with how I have controlled your personal data or how I deal with any query you may make for or regarding your data, you can make a complaint to me direct. Any such complaint will be investigated and responded to under the terms of the Crucible Chambers Complaints Policy, a copy of which can be found at [crucible.law/complaints](http://crucible.law/complaints). Details of how you can register a complaint are also set out in the policy.

You are also entitled to raise a complaint to the Information Commissioner's Office. You will find information as to how to do this at [ico.org.uk/make-a-complaint/](http://ico.org.uk/make-a-complaint/)

### **Marketing opt-outs**

You have the right to opt out of receiving marketing emails and other messages from my practice. At present, no such emails or other messages are sent by me and there is no intention for this to change. However, should you receive any such email or message in the future, you may opt out by following the instructions in those messages.

### **Review of this policy**

I will review this privacy notice regularly. When I make significant changes, I will publish the updated notice on my chambers' website profile page.

**This policy was last reviewed and updated on: 2<sup>nd</sup> July 2026**