# Thomas Buxton – Personal GDPR Privacy Policy

**Last updated: 4th November 2026**

Please read the following information carefully. This privacy notice contains details about the information that I, Thomas Buxton, a barrister practising at Crucible may collect, store, and otherwise process about you and the reasons for its processing. It also tells you who I may share this information with, the security mechanisms I have put in place to protect your data, and how to contact me if 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 practising member of chambers. 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 reference is ZA795588. If you need to contact me about your data or this privacy notice, you can reach me at thomas.buxton@crucible.law.

## Data collection and sources of information

The vast majority of the information that I will hold about you and/or any other persons will be provided to or gathered by me in the course of my practice, and which means that I acquire information about you, your case and/or proceedings and/or proceedings in which you as an individual 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:

- other legal professionals, including your solicitor;
- experts and other witnesses;
- prosecution authorities;

- courts and tribunals;
- trainee barristers;
- lay clients;
- family and associates of the person whose personal information is being processed;
- in the event of a complaint being made, Crucible's Head of Chambers, other members of Chambers who deal with complaints, the Bar Standards Board, and the Legal Ombudsman;
- other regulatory authorities;
- 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 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 will collect and process personal data and special categories of personal data as defined in the General Data Protection Regulations (the GDPR). This may include the following information:

- Name;
- Email address
- Phone number;
- Address;
- Payment or bank details;
- Date of birth;
- Next of kin details;
- Identification documentation, such as passport and driving licence for the purposes of money laundering checks, and KYC;
- 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 and philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric data for the purpose of uniquely identifying a natural person;
- Data concerning physical and mental health;
- Sex life and sexual orientation.

I will also collect and/or process personal data relating to criminal convictions and offences, criminal proceedings, outcomes, sentences, and related security measures as well as other personal data relevant to instructions that are provided to me so that I can provide legal services, including data specific to the instructions in question.

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

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

- **Consent of the data subject**. Where this is required, I will ensure that it has specific consent for processing data;
- **To provide legal services to you**;
- **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 the Bar Standards Board, who regulate me, and maintaining accurate records in support of tax returns filed with HMRC both for myself and Crucible Law Ltd, and to ensure that records are maintained for individual members of Crucible to discharge their obligations to HMRC as a Head of Crucible and a Director of Crucible Law Ltd.;
- **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;
- Processing is necessary in order to enable the provision of legal services and advice;
- Processing is necessary to check for potential conflicts of interest in relation to future potential cases;
- Processing is necessary for money laundering checks, and specifically KYC obligations placed on Crucible by the law;
- Processing is necessary in order to be able to respond to complaints or potential future complaints;
- Processing is necessary to ensure network and information security, including preventing unauthorised access;
- For purposes of practice management, accounting and debt recovery;
- For completion of professional regulatory requirements;
- Processing for direct marketing purposes, to promote and market my and/or Crucible's services or to prevent fraud; and
- Reporting threats to public security.

**Special category processing**

I will process special category data when:

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

**Criminal data processing**

I will 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 and services; or
- The purposes of establishing, exercising or defending legal rights.

**Use of your information**

I will use your information to:

- Ensure that I can provide legal advice and representation;
- Ensure that I can 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 one of Crucible's barristers' services, including making or responding to complaints or potential complaints or to deal with other regulatory issues connected to their professional role or as otherwise allowed by applicable law as a member of Crucible;
- 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 and carry out office administration;
- Checking 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.

**Sharing your information with others**

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;
- Crucible's 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;
- Your family and associates;
- 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 our consent or yours, and this can include privileged information.

I may 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 will 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 out of the EEA in any particular case. However, if you reside outside the EEA or your case involves courts, tribunals, funding parties or investigatory authorities outside of the EEA, then it may be necessary to transfer some of your data to that country outside of the EEA for that purpose. If you are in a country outside the EEA, or if the instructions you provide come from outside the EEA, 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 to me when you give your initial instructions.

Some countries and organisations outside the EEA have been assessed by the European Commission and their data protection laws and procedures found to show adequate protection, and the list of these countries and organisations can be found here. Most countries and organisations outside the EEA do not appear on this list. If your information has to be transferred outside the EEA, then it may not have the same protections, and you may not have the same rights as you would within the EEA. Should it become necessary that any of your personal data be transferred to third countries, Crucible will seek your express prior consent before this is done.

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

I will usually store your information on a computer or another electronic device, using GDPR compliant cloud storage systems. Each device I use is encrypted and password protected. Where appropriate entry can be gained through biometric data such as my fingerprint or face recognition system with the device, that is also used. I will never connect to public Wi-Fi networks where other options such as GovWifi, private networks, or a personal hotspot are available. My home Wi-Fi network does not use the default router password.

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

Where your information is supplied to me on an independent electronic device such as an external hard drive, a CD Rom or USB stick I will comply with my Chambers Policy on information management and security. In accordance with my wider professional obligations under the BSB Code rC15.5, I will also take all reasonable and necessary steps to ensure that your data is kept safe and confidential.

I will follow my own and Crucible's 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 will I retain your personal data for?**

I will retain your personal data while you remain a client or while it remains necessary for it to be retained in order for me 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 our regulator or other authority for the retention of documentation.

Examples of such periods are:

- Those set by our regulator in order to ensure that records of dealings with your case are retained for a reasonable time for the purposes of any potential legal and/or regulatory proceedings (which may include appeal proceedings). At time of writing, this minimum period is 7 years, in accordance with BSB Code rC129 and rC141. This 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. It may also be necessary to keep data for longer in specific circumstances and for particular purposes and if required by the Bar Mutual Indemnity Fund (BMIF);
- Information related to anti-money laundering checks must by law be retained until 5 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 usually 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 will 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 am informed or become aware that you as an individual or you as a firm have ceased to be a potential client.

**Your rights**

The 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 may 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.

If you are unhappy either with how I have controlled your personal data or how I deal with any query you may make 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. 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 you can do this at ico.org.uk/make-a-complaint/.

**Accessing and correcting your information**

You may request access to, correction of, or a copy of your information by contacting me at thomas.buxton@crucible.law

**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 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 and will publish the updated notice on my profile page of Crucible's website.