

## **Data protection statement**

### **Compliance with data protection legislation**

Forsters takes the security and privacy of data seriously. This document sets out our approach to compliance with the data protection legislation and provides information about how we will manage our data privacy and security obligations.

### **Collection and processing of personal and/or sensitive data**

We will collect and process personal data, including sensitive data, in order for us to carry out our contractual responsibilities with our clients and legal obligations with our regulators and/or insurers. We will collect data on behalf of ourselves and/or third parties directly related to the performance of a contract with our clients. We will not pass client data to unrelated third parties other than as required for the provision of our services. We may also hold copies of your personal data on computer servers hosted by third parties outside the UK in other jurisdictions where we operate. Where required, we ensure that appropriate safeguards are in place in respect of any transfer of personal data outside of a particular jurisdiction, which may include the agreement of "standard contractual clauses" with the relevant data importer.

Personal data we collect for the purposes of compliance with our money laundering obligations will be processed only for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your express consent. Such data will be retained in accordance with our file storage policy as set out in section 10 of our terms of business but may be retained for longer in certain circumstances.

### **Use of personal data for marketing purposes**

Personal data will only be used for marketing purposes where we have the consent of the person(s) to whom the data relates, or where there is a legitimate business reason for us to do so. In situations where the latter is applicable, individuals will always be given the opportunity to opt-out of receiving further communications. We will not initiate unsolicited contact with any individuals.

### **Authorised access to personal data**

Only partners and staff of Forsters LLP and approved third parties – where it is necessary for the performance of our contract with our clients – will have access to the personal data we hold.

### **Vetting and due diligence procedures for employees and providers**

Pre-employment vetting, including criminal background checks, is conducted on all employees and references are obtained from previous employers.

### **Due diligence on third parties and suppliers**

We undertake due diligence on a risk based approach when engaging with potential suppliers or other third parties.

Our arrangements with suppliers are subject to internal vetting, in accordance with our Supplier Management Policy, to ensure that our agreements with those suppliers provide adequate protection for data they process on our behalf.

### **Training**

All staff are provided with online data protection training on a periodic basis.

### **Remote policy**

We have an agile working policy which allows, where appropriate, employees to work remotely. The same technological measures are in place to protect remote workers from viruses and social engineering. Remote access to our network is controlled via secure authentication, including password protection for firm issued devices as well as our cloud platform.

### **Receiving personal data**

We receive personal data throughout the course of performing our contract with clients via electronic means, mail, telephone, or as a result of notes taken during face to face meetings.

### **Personal data back ups**

Our key business service systems, within which personal data is held, are backed up to disk every evening and we perform a full back up once per month. Our services are mirrored across two sites.

### **Physical security measures**

Secure entry systems are in place across all of our offices. There is a manned reception presence at each office as well as on-site security guards, and CCTV where appropriate.

### **Technological security measures**

Our online platform is password protected and we operate a "need to know" access control policy where appropriate. We are currently in the process of reviewing our access control policy in line with a firm wide information security review. Our network is secured by managed firewalls and anti-virus software. Internal and external vulnerabilities, including those on remote devices, are identified and

remediated on a daily basis. Penetration testing has been carried out and we are currently developing a regular schedule for this to be conducted going forward.

### **Destruction of physical data**

Physical records are stored securely on site and with our data storage provider. Data held on client files will be subject to file retention and destruction policies in line with data protection principles. Such files will be reviewed at appropriate intervals and destroyed accordingly. Secure destruction bins are available on each floor and we use a certified secure destruction provider.

### **Detecting and reporting breaches**

We are developing a new breach response procedure, which will be incorporated into our Privacy policy and updated Data protection policy. We will be providing firm wide training highlighting the process to follow when a breach occurs and the relevant steps to take.

### **Data subject rights**

The data protection legislation provides data subjects with certain rights. These include the right to access the data we are processing, the right to request that data be destroyed, the right to correct the data and the right to object to further data processing.

In most situations, we will not rely on consent as a lawful ground to process client data. If we do however request consent to the processing of personal data for a specific purpose, that consent can be withdrawn at any time.

Any questions or concerns regarding our data processing activities should be directed to the relevant matter partner in the first instance. If you are still not satisfied or wish to discuss your concerns further, you may also contact the firm's client partner, Helen Streeton ([helen.streeton@forsters.co.uk](mailto:helen.streeton@forsters.co.uk)).

Data subjects additionally have the right to complain to the Information Commissioner. The Information Commissioner's Office can be contacted on 0303 123 1113. Further information can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)).

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