



## Privacy Notice

Last updated **March 2026**

This Privacy Notice will be reviewed on a regular basis or when a change in legislation and/or practices dictates and any changes will be notified to you by posting an updated version on our websites and/or by contacting you via email.

We recommend that you regularly check for changes and review this policy when visiting our website(s).

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## 1. Introduction

This Privacy Notice aims to explain the types of personal data we may collect about you when you interact with us and use our website, **Invicta Law**, including any data you may provide when you purchase products, goods and services or sign up to our newsletters.

It also explains how we will store and handle your data and keep it safe.

When you are using the **Invicta Law** website, **Invicta Law Ltd** (company registration No: 10079679 (England and Wales)) is the data controller.

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our clients and their employees and other people with whom we interact in the course of undertaking our services. This Privacy Notice offers both our clients and their employees with meaningful and accessible guidance on our approach to handling personal data.



## 2. Who are we?

**Invicta Law** is a trading style of **Invicta Law Ltd**, company registration No: 10079679 (registered in England and Wales), and part of [Commercial Services Group \(CSG\)](#).

CSG is the umbrella for all its trading brands, with its ultimate parent organisation being Kent County Council. It provides the support, dependability, and security to allow all brands to thrive independently. CSG are committed to providing an excellent client and user experience underpinned by social value and a committed and empowered workforce

**Invicta Law** collects, uses and processes personal information about you. When we do we are regulated under the UK Data Protection Act 2018 (DPA 2018), the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

If you have any questions, suggestions or complaints about the processing of your personal information please contact our Data Protection Officer (DPO) via email at [dpo@cs ltd.org.uk](mailto:dpo@cs ltd.org.uk), or in writing by using the address below;

Data Protection Officer  
Commercial Services Group  
1 Abbey Wood Road  
Kings Hill  
West Malling  
ME19 4YT.

## 3. Our services

We offer a number of legal services including:

- Child Protection
- Community Care and Asylum
- Employment, Privacy and Governance
- Data Protection Officer Service for Schools

In providing these services to our clients, it will be necessary for **Invicta Law** to gather, obtain, record and hold your personal information.

## 4. The personal information we collect and use

The table below summarises the information we collect, use and retain for our services, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

The information collected	How the information is collected	Why the information is collected	How the information is used and may be shared
<p><b>Personal information:</b> such as name, job title, telephone number, email address, demographic information, usage of our website and website preferences</p> <p>We do not collect special category data from clients or potential clients</p> <p>We do collect special category data of data subjects who are subject to cases managed by Invicta Law under instruction from clients</p>	<p>From you or from client / client organisations when you contact us or instruct us or are subject to cases being managed by Invicta Law under instruction from clients and when you voluntarily complete client surveys and provide feedback</p> <p>When you opt in to receive marketing communications on our website</p> <p>Website information is collected using cookies</p>	<p>To enter into/performance of a contract.</p> <p>Public Task / Legitimate Interest: to verify your identity, to contact you and to provide the legal advice, legal representation and support which you request, to keep records of work we have done for you and to offer improvements and updates on our legal services.</p> <p>Legal obligation where individuals may be subject to the legal cases under instruction from clients.</p>	<p>For the performance of a contract to fulfil legal services</p> <p>For Fraud prevention</p> <p>Information is shared when there is a legal obligation to do so, such as with the HM Court Service, Legal Counsel etc.</p> <p>Data, including special category data is used to provide legal advice and to provide representation in court proceedings</p> <p>We do not share your information for marketing purposes with any other organisation without your consent</p>
<p><b>Financial details:</b> such as bank account details</p>	<p>From client organisations.</p>	<p>To enter into/performance of a contract.</p> <p>Legitimate interest: to maintain financial records and to comply with our legal obligations for tax/VAT.</p>	<p>To ensure you receive the contract invoices for legal services provided by us.</p> <p>Information may be shared with the HMRC for taxation purposes.</p>

We may obtain other personal data from third parties with whom we liaise in providing a service to our Clients or by a representative acting on your behalf.



Other than stated above, we may share personal information with law enforcement, our regulators or other authorities if required by applicable law.

If there is a statutory and contractual basis for collecting your personal data and you do not provide some or all of the details specified, we may be unable to enter into a contract with you or your organisation.

We do not use your personal data for automated decision making.

## 5. Marketing

We will provide you with choices regarding the use of your personal data around marketing and advertising and enable you to exercise your right to prevent such processing by:

- checking certain boxes on the forms we use to collect your personal data for marketing purposes;
- offer you opt out and unsubscribe links in all marketing emails sent to you;
- or by emailing us at [info@invicta.law](mailto:info@invicta.law) to ask us to stop sending you marketing messages.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or contract for product/service.

We will retain your contact details on a marketing suppression list to ensure we do not contact you again.

### Promotional offers from us

We may use your contact details to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

## 6. How long your personal data will be retained

We will not keep your information for longer than is necessary, for either:

- the purpose of administering your individual record;
- or as is necessary in providing a service to our client;
- or as required by law.

Upon expiry, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

For certain data sets, we have the following specific retention periods:



**Invoices:** when we invoice you for legal services delivered, the personal data you give us will be retained for current financial year plus a further 6 years so we can comply with our legal and contractual obligations.

**Identity Documents:** when we verify your identity for anti-money laundering purposes, it will be kept for five years after the end of the professional relationship.

**Legal Services Data:** when we provide legal services, that data will be kept for a minimum of seven years from the date of file closure, but can be retained for longer where the particular transaction, rule, regulation or legislation requires it.

**Client Complaints:** will be kept following the resolution of the complaint plus six years.

**Client Feedback:** will be kept from date of completion plus three years.

## 7. Who we share your personal information with

In accordance with the Solicitors Regulation Authority Code of Conduct we do not share your personal data unless disclosure is required or permitted by law, or where you have provided consent. Therefore we may share your personal data with the following organisations:

- HM Court Service
- Counsel instructed to represent you at hearings/tribunals.
- Experts who have been court authorised and directed to provide a report in relation to your proceedings, or you have instructed us to obtain a report.

We may also share your personal information with trusted third parties that are under contract with us and where it is necessary to administer our working relationship with you or where we have another legitimate interest in doing so (providing this is not overridden by your interests).

Our trusted third parties may include service providers who supply us with processing services or functions, including our contracted IT suppliers, access to data and systems is only granted where authorised and specifically required in line with our contracts with them.

Management information may be shared within Commercial Services Group, under a Data Sharing Agreement held by its operating company Global Commercial Services Group Ltd, a company registered in England and Wales (Reg No. 11735631). This Agreement reflects the requirements of the UK GDPR, DPA2018 and DUAA2025. Your personal data will not be shared unless we have your consent.

We may also need to share some of the categories of personal information with other parties where a transfer of the business takes place. Usually, information will be anonymised or pseudonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations and legally binding data sharing agreements.

## 8. Where information may be retained



Information may be retained at our offices and those of our service providers, representatives and agents as described above.

Some of the personal information you provide to us may be transferred to or made accessible to separate organisations located outside of the UK. Where this occurs, we will make the restricted transfer under UK “adequacy regulations”, which ensure appropriate protection for individuals’ rights and freedoms.

Where the UK has not issued “adequacy regulations” for the destination country, the restricted transfer will be subject to appropriate safeguards. These may include the use of standard data protection clauses, such as the International Data Transfer Agreement or International Data Transfer, when entering into restricted transfers with the organisation receiving the data.

## 9. Your rights

Under the UK GDPR you have a number of rights which allow you to:

- **Your right of access** - You have the right to ask us for copies of your personal data, however there are some exemptions which means you may not receive all the information you ask for.
- **Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

If you make a request, we have one calendar month to respond to you. If a request is deemed to be complex or a number of requests have been received from an individual, the response time may be extended by up to 2 months.

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties.

You can also withdraw your consent and opt-out from direct marketing by using the unsubscribe link at the bottom of our marketing emails.

Suppression lists will be maintained to screen against direct marketing information being sent to people who have already exercised their right to object to direct marketing. These lists will be held for compliance purposes only, and this does not affect your rights to be erased.



Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the UK General Data Protection Regulation <https://ico.org.uk/>

If you would like to exercise a right or make a complaint about how your personal data is handled by **Invicta Law**, please contact our DPO via email at [dpo@csLtd.org.uk](mailto:dpo@csLtd.org.uk) or write to Data Protection Officer, Commercial Services Group, 1 Abbey Wood Road, Kings Hill, West Malling, ME19 4YT.

## 10. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and the ICO as regulator of any suspected data security breach where we are legally required to do so.

## 11. Who to contact

If you have any questions, suggestions or complaints about the processing of your personal information, or you wish to exercise any of your rights please contact our Data Protection Officer (DPO) via email at [dpo@csLtd.org.uk](mailto:dpo@csLtd.org.uk) or in writing by using the address below;

Data Protection Officer  
Commercial Services Group  
1 Abbey Wood Road  
Kings Hill  
West Malling  
ME19 4YT.

The UK General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk> or telephone 0303 123 1113.

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.