Countrywide Estate Planning Solutions Limited Privacy notice Sept 2019

Who we are - Countrywide Estate Planning Solutions Limited (Countrywide EPS Ltd) permitted business is advising on or drafting legal documentation.

This privacy notice explains how we use any personal information we collect about you. We are committed to protecting your personal information.

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed; we will contact you to let you know.

How to contact us If you have any questions about our Privacy Policy or the information we collect or use about you, please contact;

Countrywide EPS Ltd Venture Point Towers Business Park Rugeley Staffordshire WS15 1UZ

Email: stephanie@countrywide-eps.com

Information we collect and use - We collect information about you when you engage us for estate planning / legal services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information about connected individuals - We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us.

Why do we need to collect and use your personal data - There are a number of lawful bases on which organisations can use (or process) your personal data.

Where we collect your information - We may collect your personal information

about you, from a variety of sources, including:

- Phone conversations with you
- Emails or letters you send to us
- Our online service such as our website
- We may also collect your personal information about you from a third party to which you are connected

Who might we share your information with - Where it is necessary to send your personal data to third parties to comply with the contract we confirm that that these third parties will have confirmed their compliance with the GDPR. Where it is necessary for your personal data to be forwarded to a third party, we will use appropriate security measures to protect your personal data in transit. To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

We may need to utilise the services of a Credit Reference Agency called TransUnion (formerly Call Credit). You can view their Privacy Notice here: https://www.transunion.co.uk/legal-information/bureau-privacy-notice

How long do we keep hold of your information During the course of our relationship with you we will retain personal data which is necessary to provide services to you We will take all reasonable steps to keep your personal data up to date throughout our relationship. We reserve the right to retain data for as long as is required thereafter where we believe it is in our legitimate interests to do so.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above

How we protect your information - We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake training on this.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

Your rights - Your rights under the Data Protection Act are as follows:

- 1. The right to be informed
- 2. The right of access
- 3. The right to rectification
- 4. The right to erasure
- 5. The right to restrict processing
- 6. The right to data portability
- 7. The right to object
- 8. Rights in relation to automated decision making and profiling

Please note that you have the right to request the above, however, when we receive your request we may object to your request if we do not agree with it. We will however inform you if the request has been granted or not.

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please write to us using the contact details noted above. You will be required to complete a Subject Access Request form and provide us with proof of your identity in order for us to comply with your request and depending on the work involved a charge might be made.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

Personal data and Introducers - Where you have been referred to us by one of our authorised Introducers we will collect and use your personal data for the **performance of a contract** with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal obligations. We will contact you by post, telephone and electronic means.

It is the responsibility of the Introducer to obtain your permission to collect and pass on to us the personal data of a potential customer. We will rely on the Introducer to ensure that they have a lawful basis for providing this information and have obtained consent from you to do so.

Information obtained from third parties - When obtaining personal data from other sources, we do not need to provide individuals with privacy information if:

- the individual already has the information;
- providing the information to the individual would be impossible;
- providing the information to the individual would involve a disproportionate effort;
- providing the information to the individual would render impossible or seriously impair the achievement of the objectives of the processing;
- we are required by law to obtain or disclose the personal data; or
- we are subject to an obligation of professional secrecy regulated by law that covers the personal data.

Cookies - We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit http://www.allaboutcookies.org/ You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

How to make a complaint - We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please let us know immediately and we will do our utmost to make things right.