

Customer Privacy Notice

Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (**Your Personal Data**). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

What do we mean by “Your Personal Data”?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, National Insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to any Estate Planning or related services, your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically about the processing we may undertake in relation to this type of information)
- Any pre-existing investment, pension, mortgage, finance and/or protection or insurance products and the terms and conditions relating to these

The basis upon which our Firm will deal with Your Personal Data

When we speak with you about your estate planning or other related services, we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either during initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need pass on your details to regulated government bodies for documents to be registered.

The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with, for example, drafting a Lasting Power of Attorney, we may ask you information about your ethnic origin, your health and medical history (**Your Special Data**). We will record and use Your Special Data to complete your documentation through registration.

If you have parental responsibility for children under the age of 13 we may need to record information on our systems that relates to those children and, potentially, to their Special Data. In these circumstances we will require completion of our Parental Consent Form.

Information on Special Category Data must be capable of being exchanged freely between us and other bodies, companies or individuals that can further your estate planning requirements.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to our estate planning services. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, if you are introduced to us by an individual they may pass some of your information on to us. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner.

What happens to Your Personal Data when it is disclosed to us?

While handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit Your Personal Data to Product Providers and government bodies, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment, pension, mortgage, finance and/or protection or insurance you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Third parties such as government bodies, parent company and individuals that may have introduced you to us or that we engage professional compliance with.
- In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your estate planning requirements.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

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. We will also ensure that we use appropriate security measures to protect your personal data in transit.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have a legal right to such information we will retain records indefinitely.

Your rights in relation to Your Personal Data

You can:

- Request copies of Your Personal Data that is under our control
- Ask us to further explain how we use Your Personal Data
- Ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- Ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- Change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

How to contact our Firm in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact to exercise any of your rights set out within it please contact:

CWSE Ltd, Sterling Court, 4 Gresham Road, Brentwood, Essex CM14 4HN

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Data Subject Consent Form

I hereby grant **CWSE Ltd** permission to process my personal data for the purpose stated in the Privacy statement above.

Signed

Print Name

Date

Connected Individuals Consent Form

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. We will only use their data for the furthering of your estate planning requirements.

By signing this consent form, you are agreeing that you have confirmed with such family members that they give consent for us to hold and process their information. Please assure them that they have the same rights as you do.

Signed

Print Name

Date

IMPORTANT NOTES: Marketing by our Firm

If you do not indicate your agreement for **us** to make contact with you, we may be unable to provide you with details of products and/or services that may suit your needs and circumstances.

We would like to maintain a record of your express consent for **us** to contact you by post, telephone, SMS, email and instant messaging for marketing our products or services that we think may be of interest to you. Please indicate your consent to **us** contacting you by any of the means specified below:

Post Phone SMS Email Instant Messaging*

*WhatsApp or similar service.

Marketing Consent

I, hereby grant **CWSE Ltd** permission to process my personal data for the purpose of Marketing. By providing your consent, you agree that you have given your express permission for us to market you regarding products and services that we think may be of interest to you and by any means of communication that is suitable at the time.

Signed

Print Name

Date