

## **Privacy Policy**

**1st March 2025**

In the General Data Protection Regulation (GDPR), Personal Data is defined as “... any information relating to an identified or identifiable natural person (“data subject”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location, data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.”

The following privacy policy will outline how The Right Will and Estate Planning Ltd (TRW) will collect and use your data.

### **Why do we need to collect and store personal data**

We collect and use your data to be able to carry out the services that you require from us effectively, specifically to:

- communicate with you to take your instructions,
- draft documents,
- provide you with draft and final documentation, and
- store documents for you
- for marketing correspondence.

### **What information do we collect from you**

The following personal data may be collected, held, and processed by the Company:

- Personal details which may include (without limitation): names, addresses, date of birth, sex, National Insurance number, passport number, tax identification numbers, telephone and mobile numbers and email addresses
- Employment and education history
- Lifestyle and social circumstances
- Goods and services
- Income and financial details which may include (without limitation): bank account details, investment details, insurance details, documentation of the above and notes of meetings.
- Nationality
- Photographs
- IP addresses
- Information from credit reference agencies or fraud prevention agencies and other publicly available sources
- Any other information which is provided by the individual to the Company pursuant to their contractual agreements.

### **How we use your information**

In order for us to do any of the above, we must collect and store your data for correspondence purposes. We will ensure that the information collected will only be used for its intended purpose and does not constitute an invasion of your privacy.

TRW may wish to contact you for marketing purposes, however, we would contact you for additional consent for that purpose if not already given.

We may need to pass your details onto third parties who are either contracted to or part of TRW group of companies. Any third parties who we do pass your details onto are obliged to store your details securely and only process them if responding to service requests to draft documents, provide technical support on our behalf. When the time comes that they no longer require your personal data, they will dispose of this accordingly and in line with their and our company policy.

To deliver our services, we may share your personal data with:

- a) Regulatory Bodies & Public Authorities (e.g., HM Courts & Tribunals, Land Registry) to comply with legal obligations.
- b) Professional Service Providers (e.g., legal, tax, or financial advisors such as Countrywide Tax and Trust Corporation Ltd (CTTC) and CTT Law) to administer your estate planning.
- c) Identity Verification Agencies - to prevent fraud and comply with anti-money laundering (AML) regulations.
- d) Legal Technology Providers (e.g., CTTC) - TRW uses Legacy Software, a legal tech platform subscribed from CTTC to collect and process the above personal data for the creation of legal documentation. [Privacy Policy - CTTC](#)

### **Processing and retaining information**

Processing data constitutes - collecting, storing and using. We will process this data in accordance with the GDPR. We will do our utmost to keep your information accurate and up to date and not keep it longer than is necessary. TRW may issue occasional reminders to all customers to keep their contact details up to date and will update them accordingly.

The legal documentation is produced by TRW/ CTTC in association with its legal entity CTT Law based on the data subject's service request agreed through the terms of business and other point-of-sale documents.

Please be advised that there is information that we are required to keep in accordance with the law (for a minimum of 6 years), such as information needed for tax, legal and audit purposes. Personal data may be held for longer than these periods, however, this will depend on the legal and compliance requirements of TRW and its associated companies.

### **Under what circumstances will we contact you**

We will only ever contact you when necessary, or when you have requested that we do so. We do not mean at any point to be intrusive or ask for unnecessary information. We will do our best to ensure that the information we hold is as secure as possible to minimise the risk of unauthorised access or disclosure.

### **Can you find out about the personal data that we hold about you**

If you want to see what personal data we hold on you and how it is processed, you may contact us to request this. This is known as a Data Subject Access Request (DSAR) and you must request this in writing (either by post or email), providing the necessary identification before

any information is released. If TRW stores any of your personal data, you may request information on the following:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the GDPR owner, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of TRW or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU and UK have approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision-making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### **What forms of ID will you need to provide to access this**

TRW will accept the following forms of ID when information on your personal data is requested:

- Passport copy, Photo Driving license, UK utility (dated within 90 days), Notarised ID documents

### **Contact details of the GDPR Owner**

If you have any questions regarding this privacy statement or wish to submit a DSAR or a complaint, you must do so in writing using the following information.

Address:

The Old Bank House 50 St Johns Close Knowle

West Midlands B93 0NN

Email:

admin@therightwill.co.uk

Telephone:

01564 732740

## Use of cookies on this site

To make this site simpler, small data files are placed on your computer. These are known as cookies. Most big websites do this too.

They improve things by:

- remembering settings, so you don't have to keep re-entering them whenever you visit a new page;
- remembering information you've given (e.g. your postcode) so you don't need to keep entering it;
- measuring how you use the website so we can make sure it meets your needs.

Our cookies aren't used to identify you personally. They're just here to make the site work better for you. Indeed, you can manage and/or delete these small files as you wish.

You can opt out of Google Analytics cookies for all sites.

To learn more about cookies and how to manage them, visit [AboutCookies.org](http://AboutCookies.org).

### i) First Party Cookies

These are cookies that are set by this website directly.

We use Google Analytics to collect information about how people use this site. We do this to make sure it's meeting its users' needs and to understand how we could do it better. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. We do not use cookies to collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

There are also cookies that store basic data on your interactions with WordPress, the CMS running this website.

### ii) Third Party Cookies

These are cookies set on your machine by external websites whose services are used on this site. Cookies of this type are the sharing buttons across the site allow visitors to share content onto social networks. Cookies are currently set by Twitter, Facebook and Google+. If you want to prevent sites setting third party cookies, instructions to do so are here.

### iii) Log Files

Log files allow us to record visitors' use of the site. These logs are automatically generated from all our visitors, which we use to make improvements to the layout of the site and to the information in it, based on the way that visitors move around it. Log files do not contain any personal information about you.

### **Links to other websites**

Our website contains links to our partners, as well as other external sites. You should note, that if you click through to any of these external sites, we do not have control over that site (unless it is a website which forms part of The Right Will and Estate Planning Ltd Group of companies.) We cannot be responsible for the protection of any information that you provide to these other websites as they are not governed by this privacy statement. You should always exercise caution and look at the privacy statement of whichever website it is that you are visiting.

### **Policy Changes**

TRW reserves the right to change this privacy policy and will post any revisions on this website. Your continued use of this website will be subject to the then-current privacy policy.