

## **CERTAINTY ESTATE PLANNERS LIMITED PRIVACY POLICY**

Certainty Estate Planners Limited is a part of Business Class UK Limited, a member of the Business Class Group ([www.businessclassgroup.com](http://www.businessclassgroup.com)).

This privacy policy explains how we use any personal information we collect about you.

### **What information do we collect about you?**

We collect information about you when you engage us for Wills, Trusts, a Lasting Power of Attorney (LPA), Estate Planning and other Fiduciary Services. This information will relate to your personal and financial circumstances and other special categories of personal data 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.

By “information” we mean all of the personal and financial information about you that we collect, use, share and store. The information we hold will vary according to relationship you have with us. It can include but is not limited to:

- your name, date of birth, home address, phone number and email address;
- reference numbers that we or others have allocated to you;
- your relevant financial information;
- details of your employment status, income and source of wealth;

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behavior information. We will use your information collected from the website to personalise your repeat visits to the site.

### **Information about connected individuals**

We may need to gather personal information about your close family members and dependants in order to provide our services 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. We will provide a copy of this privacy policy for them or, where appropriate, ask you to pass the privacy information to them.

### **Why do we need to collect and use your personal data?**

The primary legal basis that we intend to use for the processing of your data is for the performance of our 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. Where special category data is required, we will obtain your explicit consent in order to collect and process this information.

### **How will we use the information about you?**

We collect information about you in order to provide you with the services for which you engage us.

### **Who might we share your information with?**

If you agree, we may email you about other products or services from the Business Class Group, including the Soteria Trusts brands. We will not share your information for marketing purposes with other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy, or legal services as well as product providers that we use to provide our services to you.

Where third parties are involved in processing your data, Business Class Group Limited will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

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 such as password protection and encryption of data etc.

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.

### **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.

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

### **How can I access the information you hold about me?**

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 email or write to us at the address below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use. 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.

### **Marketing**

We would like to send you information about our products and services which may be of interest to you. If you have agreed to receive marketing information, you may opt out at any time.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact the UK Compliance Officer for Certainty Estate Planners by email at [compliance@businessclassuk.co.uk](mailto:compliance@businessclassuk.co.uk) or by post at Certainty Estate Planners Limited, 86-90, Paul Street, London EC2A 4NE.

### **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.

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

### **Your data protection rights**

Under data protection law, you have rights including:

Your right of access – You have the right to ask us for copies of your personal information.

Your right to rectification – You have the right to ask us to rectify personal information 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 information in certain circumstances.  
Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing – You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [compliance@businessclassuk.co.uk](mailto:compliance@businessclassuk.co.uk) if you wish to make a request.

### **What can you do if you are unhappy with how your personal data is processed?**

If you have any concerns about our use of your personal information, you can make a complaint to us in writing to the Compliance Officer, Business Class UK Limited, 86-90, Paul Street, London, EC2A 4NE or [compliance@businessclassuk.co.uk](mailto:compliance@businessclassuk.co.uk).

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

### **Changes to our privacy policy**

We keep our privacy policy under regular review and place any updates on our website and/or inform you of any changes when they occur. This privacy policy was last updated on 20<sup>th</sup> June 2021.

### **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you by email to [compliance@businessclassuk.co.uk](mailto:compliance@businessclassuk.co.uk) or to Business Class UK Limited, 86-90, Paul Street, London EC2A 4NE.