

## Data Protection and Privacy Policy

### **INTRODUCTION**

Welcome to HWP LIMITED trading as HAIRSINES WILLS AND PROBATE's privacy notice.

HWP LIMITED trading as HAIRSINES WILLS AND PROBATE respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data to include when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice deals with the specific areas set out below. Please use the glossary below to understand the meaning of some of the terms used in this privacy notice:

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

10. GLOSSARY

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**1. IMPORTANT INFORMATION AND WHO WE ARE**

### **PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how HWP LIMITED trading as HAIRSINES WILLS AND PROBATE collects and processes your personal data.

This is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## **CONTROLLER**

HWP LIMITED trading as HAIRSINES WILLS AND PROBATE is the controller and responsible for your personal data (collectively referred to as " HWP LIMITED trading as HAIRSINES WILLS AND PROBATE ", "we", "us", or "our" in this privacy notice.

We have appointed a data protection officer (DPR) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## **CONTACT DETAILS**

Our full details are:

Full name of legal entity: HWP LIMITED trading as HAIRSINES WILLS AND PROBATE

Name and title of DPO: ROBERT IAN HAIRSINE DIRECTOR, SOLICITOR

Email address: [info@hairsines.co.uk](mailto:info@hairsines.co.uk)

Telephone number: 01482 629295

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on 25<sup>th</sup> May 2018. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Usage Data** includes information about how you use our website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods

or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED**

We use different methods to collect data from and about you which may include:

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details

**Third parties or publicly available sources.** We may receive Technical Data from analytics providers such as Google based outside the EU.

**Usage Data** includes information about how you use our website.

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your data (a) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, and (b) where we need to comply with a legal or regulatory obligation.

The types of lawful basis that we will rely on to process your personal data are set out below.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

At HWP LIMITED trading as HAIRSINES WILLS AND PROBATE , we are committed to protecting your privacy. Set out below is an explanation of how we use information about visitors to this site.

a. We may use your Technical Data to administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data. Such use would be necessary for our legitimate interests (for running our business,

provision of administration and IT services, to prevent fraud and in the context of a business reorganisation exercise), and to comply with a legal obligation.

b. We may use your Usage Data and Technical Data to deliver relevant website content to you and measure or understand the effectiveness of the content. Such use would be necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform market strategy).

c. We may use your Usage Data and Technical Data to use data analytics to improve our website, services, marketing, customer relationships and experiences. Such use would be necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

### **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any third-party company for marketing purposes. If you give us your express opt-in consent, you can ask us or third parties to stop sending you marketing messages at any time by contacting us.

### **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about cookies we use, please see our cookie policy below.

### **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out at paragraph 4 above:

- a. External Third Parties as set out in the glossary.
- b. Third Parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business and need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **8. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under the data protection laws in relation to your personal data. Your rights are listed below, and more detail can be found in the glossary below:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We will respond within 28 days of the request

## **9. GLOSSARY**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any particular impact on you in respect of specific activities by contacting us.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **EXTERNAL THIRD PARTIES**

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors including solicitors, bankers, auditors, accountants and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue and Customs, regulators and other authorities acting as processors based in the UK who require reporting of processing activities in certain circumstances.
- Law Society
- Solicitors Regulation Authority

### **YOUR LEGAL RIGHTS**

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to



ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. note that this right only applies to automated information which you initially provided consent for us to use or where we used information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

## **10. COOKIE POLICY**

Like many websites, the HWP LIMITED trading as HAIRSINES WILLS AND PROBATE website may use cookies – small text files, typically of letters and numbers – to capture limited information about the site's users. The information is transferred by the website to the cookie file of the browser on the hard drive of the user's computer.