



Privacy Notice

Greenwell Consultancy with its office at 7, Exmouth Road, Ruislip, Middlesex HA4 0UX is committed to protecting and respecting your privacy.

This policy (together with our terms and conditions) sets out the basis on which any personal data we collect from you, or from any other sources but about you, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection laws in the UK, the data controller/processor is Darrell Storey t/a Greenwell Consultancy. We are registered as a data controller with the Information Commissioner's Office under number Z1937981.

Basis for processing personal data: The paragraphs in this section explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

To enter into and perform contracts with you: Where you ask us to provide will writing and/or ancillary services to you, including Probate Administration, we will process your personal data to provide these services. Our use of your personal data in this way includes, in particular, passing your personal data through our in-house technology which generates your will and/or any other relevant documents. We need to process your personal data in this way to enter into and perform the contract for will writing services with you. If you do not wish to provide us with your personal data in this way, you will be unable to use our services.

For marketing purposes: Where you have opted in to receive marketing communications from us, we will process your personal data to provide you with marketing communications in line with the preferences you have provided.

Where you have opted in to receive communications from third parties we suggest, we will transfer your personal data to them in order for them to send you such communications.

The legal basis on which we process your personal data for marketing purposes is your consent. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at darrell@greenwellconsultancy.co.uk or by following the unsubscribe link in any marketing communication you receive from us.

If you do choose to withdraw your consent, this will not mean that our processing of your personal data before you withdrew your consent was unlawful.

Information we collect from you: We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us in a face to face meeting or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, address, e-mail address and phone number, and other information related to your assets and family circumstances.
- **Information we collect about you.** This may include information provided with your permission by your financial or other professional adviser and/or information collected by us from public sources such as Land Registry.

Uses made of the information: We will combine the information you provide to us with information we collect about you. We will use this combined information or elements of it for the purposes set out above.

Where we store personal data: All information you provide to us is stored securely in ALS offices and on our computer system.

If we share your details with anyone else - Unless legally obliged to do so we will only share your details with a third party with your express permission - such as when a storage service is required for documents that have been produced for you. Any third parties to whom we pass your information are obliged to store your details securely. When the time comes that they no longer require your personal data they will dispose of this accordingly and in line with our policy.

Period of storage: Where you provide us personal data but do not complete the process of creating your will and/or other products, we will retain your data for a period of 3 years to ensure that we are able to assist you should you have any questions or feedback in relation to our services.

Due to the nature of the services and pursuant to Article 17(3) GDPR, if you complete a will and/or other products using our service we will securely store your data indefinitely. This is in order to protect against legal claims, as well as to provide supporting information if your will or other document is ever questioned or contested.

Where we have processed your personal data to provide you with marketing communications with your consent, we may contact you at least every 12 months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our list.

Use of 'cookies' - Cookies are small data files that seek permission to be placed upon your computer by most websites that you visit. Some parts of the ALS website may use a cookie. The cookie captures no personally identifying information. The cookie can be used to provide certain features during your visit to the website. You can set your browser to warn

you when a placement of a cookie is requested and decide whether or not to accept it. By rejecting a cookie some of the features available on the site may not function properly.

Your rights under data protection laws

Right to object: You have the right to object to us processing your personal data where we are processing your personal data based on our legitimate interests (as set out above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws. As for direct marketing purposes, if you ask us to stop processing your personal data on this basis, we will stop.

Right of access: You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing.

Right to rectification: You have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

Right to restriction: You have the right to restrict our processing of your personal data where:

- the accuracy of the personal data is being contested by you; the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;
- we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims;
- or we are processing your data on the basis of our legitimate interest (as set out above) and you object to our processing on this basis; and want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.

Where any exercise by you of your right to restriction determines that our processing of particular personal data is to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of dealing with legal claims.

Right to data portability: You have the right to receive your personal data in structured, standard machine readable format and the right to transmit such personal data to another controller.

Right to erasure: You have the right to require that we erase your personal data which we are processing where at least one of the following grounds applies:

- the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;
- our processing of your personal data is based on your consent and you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;
- you object to the processing as set out in the “right to object” section of this policy and we have no overriding legitimate interest for our processing;
- the personal data has been unlawfully processed; and the erasure is required for compliance with a law to which we are subject.

You also have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

Exercising your rights: You can exercise such rights by contacting us at darrell@greenwellconsultancy.co.uk or by post to Greenwell Consultancy – 7, Exmouth Road, Ruislip, Middlesex HA4 0UX.

Changes to our privacy policy: Any changes we make to our privacy policy in the future will be posted on the GC website (www.greenwellconsultancy.co.uk) . You can check back at any time to see any updates or changes to our privacy policy.

Contact: Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to darrell@greenwellconsultancy.co.uk or by post to Greenwell Consultancy – 7, Exmouth Road, Ruislip, Middlesex HA4 0UX.

This privacy policy was last updated on 1st May 2018.