

Privacy Notice

August 2025

This document explains what We will do with Your Personal Data, and the rights you have in relation to Your Personal Data.

1. Who We are

“We”, “Us” and “Our” in this notice means Integrity Estate Planning Limited, St Margarets, Hambledon Road, Denmead, PO7 6NU. It also includes where relevant to any policies or products arranged by Us. For the purposes of the Data Protection Act 1998, We are Data Controllers (the holder, user and processor) of the information.

When We say, “you” and “yours” in this notice, We mean anyone whose personal information We may collect.

2. How We Collect Your Personal Data

The information We collect about you comes from:

- Information you have given Us as part of the application process to allow Us to provide you with advice and services
- Forms you have completed and given to Us
- Information that you have given Us over the telephone
- Letters and/or emails that you have sent to Us
- Details of any checks We have made to ensure the accuracy of the information We hold

We may also obtain some information from third parties, for example, credit checks, information from your employer or other professional advisers (e.g. accountant, solicitor), and searches of information in the public domain such as the voters roll. If We use technology solutions to assist in the collection of Your Personal Data for example software that can verify your credit status, We will only do this if We have consent from you for Us or Our nominated processor to access your information in this manner. With regards to electronic ID checks We would not require your consent but will inform you of how such software operates and the purpose for which it is used.

3. What information We collect about you - “Your Personal Data”

Personal data is defined as any data which relates to a living individual who can be identified:

- from the information held, or
- from the information combined with any other information which is already in the possession of, or likely to come into the possession of, the person or organisation holding the information

In the context of providing you with assistance in relation to your estate planning requirements 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
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Any existing savings, investments, pensions, mortgages, finance or insurance products and the terms and conditions relating to these

Certain types of data are categorised as "sensitive personal data", for example:

- Racial or ethnic origin
- Physical or mental health/condition
- Sexual life
- Criminal offences (including alleged offences)
- Religious or other similar beliefs of a similar nature

4. Why We may need Your Personal Data

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

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.

- Provision of Estate Planning Services & Advice
- To assist Us in keeping in contact
- To ensure that Our advice is accurate, relevant and suitable
- To enable Us to represent your interests in relation to third-party companies (e.g. product-providers)
- To assist your family and dependants (when authorised to do so)

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 to respond to requests from solicitors, accountants or other providers relating to the advice We have given to you, or to contact you to seek feedback on the service you received.

On occasion, We will use Your Personal data for compliance with any legal or regulatory obligation to which We might be subject. In such circumstances, We would be processing Your Personal Data to meet a legal, compliance or other regulatory obligation to which We are subject.

5. Why We may need Your Sensitive Personal Data

If you have parental responsibility for children under the age of 13, it is also very likely that We will record information on Our systems that relates to those children and potentially, to their sensitive personal data.

Information on sensitive personal data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as Our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

6. What We do with Your Personal Data

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, 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 may arise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any documents we may have produced, or to inform you of any developments in relation to those documents of which We might become aware.

7. Sharing Your Personal Data

To provide advice and services it may be necessary to share information with third parties to:

- Check the accuracy of the data We hold
- Ensure We meet Our statutory and regulatory legal obligations
- For law enforcement, regulation, licensing, criminal prosecution and court proceedings
- Recover money owed to Us
- To provide more services through third parties e.g. We may employ agencies to act for Us.
- To maintain the security and safekeeping of the personal data held

We will only use the data We hold to fulfil these functions efficiently and effectively.

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

- Third parties who We believe will be able to assist Us with your enquiry or application, or who are able to support your needs as identified where We believe this to be required due to your circumstances. These third parties will include but may not be limited to, Our Compliance Advisers, will/LPA/legal document providers, GOV.UK/HMRC web services, banks/building societies, investment and pension providers, insurance providers, product specialists, estate agents, providers of legal services such as conveyancing, surveyors and valuers.
- Where there is a legal requirement to do so – regulatory bodies, relatives, guardians, child support agency or law enforcement agencies.

Your personal data will not be used for any sales or marketing purposes outside of Us and We will not pass your information onto third parties unless We have your consent to do so, or We are required by law to do so e.g. for fraud or crime purposes.

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.

8. 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 have data security procedures and an Information Security Policy to ensure We protect Our manual and electronic data from accidental loss or misuse. We only permit access to information where there is a legitimate reason to do so.

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 legal right to such information We will retain records indefinitely.

9. 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)

You can submit a data subject access request to see what information We hold about you. We do not charge a fee for providing you with Your Personal Data. Your request will be dealt within the statutory period of 40 calendar days.

Data subject access requests are subjected to the exemptions of the Data Protection Act 1998

10. How to contact Us in relation to the use of Your Personal Data

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

Data Protection Officer, Integrity Estate Planning Limited, St Margarets, Hambledon Road, Denmead, PO7 6NU.

If We feel We have a legal right not to deal with your request, or to action, it in a 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.