

Privacy Policy

We take your privacy seriously and will only use your personal information to provide the products and services you have requested from us and to send you information about products and services you may be interested in. We will never sell, share or use your personal information other than as described here.

About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Legal Planning Solutions Ltd.

The Data Protection Act 1998 (DPA) and General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than is necessary
6. Processed in accordance with the rights of the data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection.

Legal Planning Solutions Ltd take these responsibilities seriously, this document describes our approach to data protection.

This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- Information you contact us and request information such as your name, email address and contact details, and other preferences
- When you contact us in order to discuss using our services
- Information we collect about how you use the website
- Information relating to services we offer to you and other transactions including financial and other

personal information required to complete these transactions

- Information given and stored as part of our ongoing relationship
- We do not collect or process sensitive data about you.

How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity, (b) Contact	Performance of a contract with you
To process and deliver the products and services you request including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us
To manage our ongoing relationship with you which will include notifying you about changes to our terms, products and services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

We may collect and process information about you, including your name, date of birth, address, contact details (including email address and mobile phone number), purchase history and data collected as part of payment.

We may take personal information from:

- Information that you provide to us when registering with our website (including your email address);
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us;
- Information relating to any purchases you make of our services, including any other transaction details made via any of our websites (including your address, telephone number and payment details)

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding the possible purchase of services;

- To carry out our obligations arising from any contracts entered into between you and us including purchase of provision of services, and to respond to queries from you regarding those contracts;
- To manage and administer the relationships between you and us;
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us; and
- To obtain feedback from you regarding us; and
- To provide you with and relevant reminders.

In accordance with your preferences, we may also use your personal information to provide you with information about services, promotions and offers that may be of interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases.

Personal Data

In the EU's 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."

How we use your information

The following privacy policy will outline how Legal Planning Solutions Ltd will collect and use your data. This is done so that we can:

- Contact you if requested.
- Take your instruction to enable your Will to be drafted.
- To ensure your end of life planning requirements and provide a quality of service.
- To provide wealth management services if required.

Why do we need to collect and store personal data?

In order for us to do any of the above, we must collect and store your data firstly 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.

Under Article 14 of the GDPR we accept that we are collecting information about data subjects without their express permission. Due to the purpose of the production of a will we assert that an exception under clause Article14 (5b) applies. In that the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing.

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

Will we share your personal data with anyone else?

We may need to pass your details onto third parties who are either contracted to, or part of the Legal Planning Solutions Ltd 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 a specific product or service 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 our company policy. If we wish to pass your personal data to a third party, we will only do so with your explicit consent, unless we are legally obliged to do so otherwise.

We may need to pass your details onto third parties who are either contracted to, or part of the Legal Planning Solutions Ltd group of companies. Third parties currently contracted to Legal Planning Solutions Ltd are WillPack (Chancery House, Whisby Way, Lincoln, LN6 3LQ). Clarke Bell Limited (3rd Floor, The Pinnacle, 73 King Street, Manchester, M2 4NG). (The David Penney Practice is a trading name of Kensington House Financial Partners Ltd. Kensington House Financial Partners Ltd. Registered Office: Kensington House, Knights Way, Battlefield, Shrewsbury, Shropshire, SY1 3AB, UK). Intelligence Mortgage Solutions Limited is an appointed representative of TenetLime Ltd which is authorised and regulated by the Financial Conduct Authority. Intelligence Mortgage Solutions Limited. (Registered office Lancaster Court, 8 Barnes Wallis Road, Segensworth, Fareham, Hants PO15 5TU).

Any third parties who we do pass your details onto are obliged to store your details securely and only process them if carrying out drafting services for Wills and other related documents on our behalf.'

How will we use the personal data we collect about you?

Processing data constitutes as 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. Legal Planning Solutions Ltd may issue occasional reminders to all customers to keep their contact details up to date and will update them accordingly.

Please be advised that there is information that we are required to keep in accordance with the law, such as information needed for tax and audit purposes. Personal data may be held for longer than these periods, however this will depend on the individual needs of the company.

How to change your preferences

We operate in line with EU GDPR (May 2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at anytime.

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 Legal Planning Solutions Ltd do store 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 Legal Planning Solutions Ltd 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 has 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 in order to access this?](#)

Legal Planning Solutions Ltd will accept the following forms of ID when information on your personal data is requested:

Passport; Photo Driving Licence; Utility Bill (from the last three months); Notarised ID Document;

How we store and process your data

Your data will be collected stored and processed in the UK only, we do not transfer your data outside the EU.

In order to provide or services to you we use recognised third parties to take payment, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU, if this is the case we will ensure precautions are in place to protect your data.

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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information].

You will only receive marketing communications from us if you have:

- requested information from us or purchased services from us; or
- if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing

purposes.

Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the Data Protection Act 1998 and the GDPR (2018) in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes
- We will take steps to ensure your data is accurate and rectify data as necessary

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- 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.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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.

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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

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 need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

Contact details of the GDPR Owner

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

Address:

Centaur House,
Ancell Business Park,
Ancell Road,
Fleet,
Hampshire,
GU51 2UJ

Email:

info@legalplanningsolutions.co.uk

Telephone:

01252 761 016

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](#).

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, Duda 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 Legal Planning Solutions 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

Legal Planning Solutions Ltd reserves the right to change this privacy policy and will post any revisions on this web site. Your continued use of this web site will be subject to the then-current privacy policy.

Contacting us, exercising your information rights and Complaints

If you any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: The Data Protection Officer at Norman Laing. We will process SARs within 20 days, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House

Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk
Wycliffe House