At Cavendish House Trust, we’re committed to protecting and respecting your privacy.

When you visit our website, we collect certain basic information and we recognise the importance of keeping this data secure.

This Privacy Policy sets out the basis by which any personal data we collect from you, or that you provide to us, will be processed by us. It describes who has access to this data and what your rights are. We are the “controller” of the data you provide to us.

Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will treat it.

You have the right to object to us processing your personal data for certain reasons – you can read more about this in the “Your rights” section of this policy.

Information we may collect and why

We will collect and process the following data about you:

a) Information you give us

This is information about you that you give us by filling in forms on our site cavendishhousetrust.co.uk 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, financial and credit card information and other information related to your assets or relating to your involvement in the estate of someone who has died.

b) Information we collect about you

With regard to each of your visits to our Website we may automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and information about your visit, including the full Uniform Resource Locators (URL), clickstream to,
through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

Cookies

What are cookies?

When you visit our website, we collect information about how you have used our site through cookies. Cookies are small files which are stored on your computer, tablet or smartphone. They are designed to help websites remember who you are and other information about your visit.

What cookies are used on this website?

The types of cookies we and our business partners use on our website are broadly grouped into the following categories:

**Essential** – Some of the cookies on our website are necessary to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our website. You may not be able to use our site without these cookies.

**Analytics** – We use analytics cookies to provide statistics on how our website is used and to understand how visitors engage with it. An example is counting the number of different people coming to our site. We would find it difficult to analyse how well our website was performing and improve it without using these cookies.

**User** – We use these cookies to remember you the next time you visit our website, enabling us to personalise your experience so that it matches your interests.

**Social sharing** – We use third-party cookies to allow you to share our content on social network sites like Facebook. More information about this can be found in our “Third Party Cookies” section below.

**Interest-based advertising** – To try and ensure that the adverts you see on a website are relevant to you; third-party cookies may be used to collect information about your interests. Having these cookies does not increase the number of adverts you will see, but does make the adverts more relevant to
How can I reject or opt out of receiving cookies?

You may refuse to accept cookies by activating a setting on your browser. However, if you select this setting, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Third party cookies

Some of the cookies described above are stored on your machine by third parties when you use our website. Third parties may also read cookies on your browser to collect information or to provide content/advertisements to you. We have no control over these cookies or how these third parties use them. They are used to allow that third party to provide a service to us, for example, site analytics.

How we use your personal data

We use your personal data to track your activity on our website so that we can monitor its usage and provide you with a more personalised experience.

In certain circumstances we may also use your personal data to investigate, detect and prevent fraud and comply with our legal obligations. This may require us to provide your personal data to law enforcement agencies if they request it.

Who we share your personal data with

We will not provide your personal information to any third parties. However, we may disclose personal information about you to the extent we are required to do so by law.

How long we keep your personal data for

We keep your personal data no longer than is necessary for the purpose(s) for which it was provided. When determining the retention periods relevant to different types of data, we take into account factors including:
• legal obligation(s) under applicable law to retain data for a certain period of time;
• the statute of limitations under applicable law;
• potential or actual disputes; and
• guidelines issued by relevant data protection authorities.

Otherwise, we are obliged to securely erase your personal data from our systems when it is no longer needed.

Your rights

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; and for direct marking 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 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 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, 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 have 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 or request further information by contacting us via the Contact Us page [https://www.cavendishhousetrust.co.uk/contact-us](http://www.cavendishhousetrust.co.uk/contact-us)

If you are not satisfied with our response to any enquiries or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner’s Office (ICO) in the following ways:

• In writing to the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF;
• By calling 0303 123 1113;
• By visiting the ICO website at https://ico.org.uk/concerns/
Links to other websites

This website contains links to other websites. We are not responsible for the privacy policy of any third party websites.

Please check these policies before you submit any personal data to these websites.

Changes to this Privacy Policy

This policy is reviewed every 2 years. This policy was last updated on 18th July 2019.

Any changes we may make to our Privacy Policy in the future will be posted on this page. However, we advise that you check this page regularly to keep up to date with any necessary changes.