

Privacy Notice

- COUNTRYWIDE TAX & TRUST CORPORATION LIMITED is registered in England. Registered address - 30 Binley Road, Coventry, West Midlands, CV3 1JA. Registration number - 04844596.
- COUNTRYWIDE TAX & TRUST CORPORATION LIMITED's permitted business is advising on or drafting legal documentation.

This privacy notice explains how we use any personal information we collect about you.

What information do we collect about you?

We collect information about you when you engage us for estate planning / legal services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us.

Why do we need to collect and use your personal data?

There are a number of lawful bases on which organisations can use (or process) your personal data.

Performance of a contract

The primary legal basis that we intend to use for the processing of your data is for the **performance of a contract** with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal obligations. We will contact you by post, telephone and electronic means.

Non client / third party personal data

We rely on the basis of **legitimate interests** where it is necessary to collect and process third party/non client personal data which is necessary for the performance of a contract with you and to comply with our legal obligations

Changes in legislation

Part of fulfilling our contract with you means it may also be necessary to contact you in regards to changes in legislation in order to ensure that your estate planning / legal services remain effective. We will contact you by post, telephone and electronic means.

Special Category Data

Where special category data is required, in addition to processing under the lawful bases referred to above, we will also generally rely on the condition that processing is necessary for

the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity to collect and process this information as detailed in Article 9(2)(f).

Legitimate Interests

If we use your information for a reason other than to complete your contract, or to advise you of changes in legislation, such as contacting you in regards to additional legal products and services, then we generally rely on the following lawful basis:

Legitimate Interests: Where it is necessary for the purposes of the legitimate interests pursued by us or a third party in line with GDPR Article 6(1)(f).

Legitimate interests means the interests of our company in conducting and managing our business, to enable us to give you the best services and products.

Additional legal products & services

We may rely on **Legitimate Interests** for the purpose of sending you information about our legal products and services. For example, we have an interest in making sure the information is relevant for you, so we may process your personal data in order to provide you with information that is specifically tailored to your interests. We will contact you by post, telephone and electronic means.

Before doing this, we ensure that we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws with our business objectives. Our legitimate business interests do not automatically override your interests. We will 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 are of course, free to opt out of receiving these messages at any time. We will include clear information about how to do so in all of our messages.

We will not share your information with other companies other than those it is necessary to engage for professional compliance, accountancy or legal services.

Who might we share your information with?

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services.

Where it is necessary to send your personal data to third parties to comply with the contract we confirm that that these third parties will have confirmed their compliance with the GDPR.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

We may need to utilise the services of a Credit Reference Agency called TransUnion (formerly Call Credit). You can view their Privacy Notice here:

<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>

How long do we keep hold of your information?

During the course of our relationship with you we will retain personal data which is necessary to

provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship. We reserve the right to retain data for as long as is required thereafter where we believe it is in our legitimate interests to do so.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How can I access the information you hold about me?

Your rights under the Data Protection Act are as follows:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Please note that you have the right to request the above, however, when we receive your request we may object to your request if we do not agree with it. We will however inform you if the request has been granted or not.

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information please email our Data Protection Officer on compliance@countrywidegroup.co.uk or write to us using the contact details noted below. You will be required to complete a Subject Access Request form and provide us with proof of your identity in order for us to comply with your request and depending on the work involved a charge might be made.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

Personal data and Introducers

Where you have been referred to us by one of our authorised Introducers we will collect and use your personal data for the **performance of a contract** with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal obligations. We will contact you by post, telephone and electronic means.

It is the responsibility of the Introducer to obtain your permission to collect and pass on to us the personal data of a potential customer. We will rely on the Introducer to ensure that they have a lawful basis for providing this information and have obtained consent from you to do so.

Information obtained from third parties.

When obtaining personal data from other sources, we do not need to provide individuals with privacy information if:

- the individual already has the information;
- providing the information to the individual would be impossible;
- providing the information to the individual would involve a disproportionate effort;
- providing the information to the individual would render impossible or seriously impair

the achievement of the objectives of the processing;

- we are required by law to obtain or disclose the personal data; or
- we are subject to an obligation of professional secrecy regulated by law that covers the personal data.

Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/> You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

Google Analytics

This website uses Google Analytics, a web analysis service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043, USA. Google Analytics also uses cookies that allow, among other things, to analyse the way you use the website. As a rule, the information generated by these cookies is transferred to and stored on a server operated by Google in the USA. Google will use this information on behalf of the operator of this website in order to evaluate your use of the website, compile reports regarding website activities and provide services for the website operator relating to website and Internet usage. These reports and services are used to continuously improve the facilities offered by this website. You can prevent the storage of cookies by making an appropriate setting in your browser. We must point out, however that if you do so, you will be unable to use all the functionalities of this website to their full extent. You can also prevent the capture and processing of data relating to your use of the website (incl. your IP address), generated by these cookies, by Google by simply downloading and installing the following Google browser plug-in, clicking on the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. Google's data privacy statement, is available at www.google.com/intl/en/policies/privacy/

Vimeo

This website contains embedded Vimeo videos on some pages or provides links to Vimeo videos. Vimeo is a video service provided by Vimeo Inc, 555 West 18th Street, New York, New York 10011. Vimeo's data privacy statement is available at <https://vimeo.com/privacy>

Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

What can you do if you are unhappy with how your personal data is processed?

You have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Changes to our privacy policy

We keep our privacy policy under regular review and we will inform you of any changes when they occur. This privacy policy was last updated on 11th April 2018.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you, by email, at: compliance@countrywidegroup.co.uk

Or write to us at: Countrywide Tax & Trust Corporation Ltd, Gables House, 62 Kenilworth Road, Leamington Spa, Warwickshire CV32 6JX