

## Privacy Policy - for Beneficiaries of an Estate or Trust only

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data we are regulated under the UK General Data Protection Regulation (UK GDPR) and we are responsible as 'controller' of that personal data for the purposes of the UK GDPR. Our use of your personal data is subject to our instructions from you and our client (the executors or other personal representatives of the deceased person whose estate we are dealing with) the UK GDPR and any other relevant UK legislation and our professional duty of confidentiality.

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	NORRIE WAITE AND SLATER SOLICITORS
Our data protection officer	Jon Darwin <a href="mailto:dataprotection@norrie-waite.com">dataprotection@norrie-waite.com</a>
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

### Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of our dealings with you.

Personal data we will collect	Personal data we may collect depending on why you are dealing with us
Your name, address and telephone number.  Information to enable us to check and verify your identity, e.g. your date of birth or passport details and details to verify your address  Electronic contact details, e.g. your home address, email address and mobile phone number  Information relating to the legal matter in which you are involved  Information about your preferred method of communicating with us	Your National Insurance and tax details  Your bank and/or building society details  Details of your relationship to or connection with the deceased or with other beneficiaries of the estate

This personal data is required to enable us to ensure you receive your inheritance in a timely manner. If you do not provide personal data we ask for, it may delay or prevent us from ensuring this.

## How your personal data is collected

We collect most of this information from you direct or from the executors or other personal representatives of the estate. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
  - sanctioned screening providers;
  - credit reference agencies;
  - client due diligence providers;
- from a third party with your consent, e.g.:
  - your bank or building society, another financial institution or advisor;
  - consultants and other professionals we may engage in relation to your matter;
  - your employer and/or trade union, professional body or pension administrators;
  - your doctors, medical and occupational health professionals;
- via our website - we use cookies on our website (for more information on cookies, please see our [www.norriewaite.co.uk/regulatory-policies.html](http://www.norriewaite.co.uk/regulatory-policies.html) cookies policy)
- via our information technology (IT) systems, e.g.:
  - case management, document management and time recording systems;
  - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

## How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with the executors or other personal representatives of an estate or to take steps at your request;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide legal services in which you are named as a beneficiary	For the performance of our contract with an executor or administrator of an estate or to take steps at your request
Conducting checks to identify you as a beneficiary and verify your identity Screening for financial and other sanctions or embargoes	To comply with our legal and regulatory obligations

Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service on the matter that involves you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service at the best price on the matter that involves you
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service at the best price on the matter that involves you
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing client records	For the performance of our contract with the executors or other personal representatives of an estate or to take steps at your request  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service on the matter that involves you
Marketing our services and those of selected third parties to: - existing and former clients; - third parties who have previously expressed an	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former clients

interest in our services; - third parties with whom we have had no previous dealings.	
External audits and quality checks, e.g. for Lexcel, ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards. To comply with our legal and regulatory obligations

The above table does not apply to special category personal data, which we will only process with your explicit consent.

### Promotional communications

We will not use your personal data to send you promotional material without your express consent.

### Who we share your personal data with

We routinely share personal data with:

- professional advisers who you ask us to instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors, financial advisors or other experts;
- other third parties where necessary to carry out our clients' instructions e.g. a mortgage provider or HM Land Registry in the case of a property transaction or Companies House;
- our insurers and brokers;
- external auditors, e.g. in relation to ISO or Lexcel accreditation and the audit of our accounts;
- our banks;
- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. typing services, marketing agencies, document collation or analysis suppliers;

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

### Where your personal data is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see '**Who we share your personal data with**').

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the UK**'.

## How long your personal data will be kept

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

## Transferring your personal data out of the UK

To deliver services to our clients, it is sometimes necessary for us to share your personal data outside the UK, e.g.:

- with your and our service providers located outside the UK;
- if you are based outside the UK;
- where there is an international dimension to the matter which we are dealing with.

These transfers are subject to special rules under UK and European data protection laws.

The following countries to which we may transfer personal data have been assessed by the UK Government as providing an adequate level of protection for personal data: the EU and other countries forming the European Economic Area (EEA), Argentina & Canada - private organisations only, Guernsey, Jersey, Isle of Man, Switzerland, Israel, Faroe Islands, New Zealand, Uruguay

Except for the countries listed above, other countries do not have similar data protection laws as the United Kingdom. We will, however, ensure the transfer complies with data protection law and all personal data will be secure. Our standard practice is to use data protection contract clauses which have been approved for use between the UK and such other countries.

If you would like further information please contact, our Data Protection Officer (see '**How to contact us**' below).

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data - in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data - in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured,

	commonly used and machine-readable format and/or transmit that data to a third party- in certain situations
To object	The right to object: - at any time to your personal data being processed for direct marketing (including profiling); - in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the UK General Data Protection Regulation](#).

If you would like to exercise any of those rights, please complete a data subject request form - available on our website at <https://www.norriewaite.co.uk/data-subject-access-request-form.html>

- email, call or write to us, our Data Protection Officer - see below: 'How to contact us'; and
- let us have enough information to identify you - your full name, address and client or matter reference number;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

### Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

### How to complain

We hope that we or our Data Protection Officer can resolve any query or concern you may raise about our use of your information.

The UK GDPR also gives you right to lodge a complaint with a supervisory authority where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113

## Changes to this privacy policy

This privacy policy for beneficiaries was published on 7<sup>th</sup> January 2022.

We may change this privacy policy from time to time; when we do we will inform you via our website and written correspondence.

## How to contact us

Please contact us and/or our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	
Norrie Waite & Slater 9-12 East Parade Sheffield S1 2ET	Jon Darwin <a href="mailto:dataprotection@norrie-waite.com">dataprotection@norrie-waite.com</a> Tel: 0114 2766 166