

Privacy Policy as at 1st January 2023

Background:

Mrs Sara Louise Sheppard understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

This Policy applies to our use of any and all data collected by us in relation to your use of our services (including accessing our website). Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Our Services”	means instructing us to provide you with our products services;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 11, below;]
“Our Site”	means this website, https://www.slswillsandmore.co.uk/ ;
“UK and EU Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015; and related regulations, such as the General Data Protection Regulations 2018
“We/Us/Our”	means SLS Wills and More Limited,

2. Information the data controller

The Data Controller is SLS Wills and More Limited, registered address is 4 Garrity House, Miners Way, Aylesham, Canterbury CT3 3BF registered company no. 12384538. Our registration number with the Information Commissioner’s Office is ZA436144.

If you want to contact us about any of the points on this notice, or just generally about how we protect your privacy, please email Sara Sheppard at sara@slswillsandmore.co.uk. We use this email address for all data protection and data access matters.

3. What personal information do we collect?

To deliver our advisory services to you we will need identification documents for legal & anti-fraud checks, your contact details and information related to your plans for financial and will

management. Some of this information may be quite sensitive, because it can reflect your beliefs and values.

If you visit our website, it will automatically collect some information about you. (For further details, please see section 11 on Our use of Cookies), other data will only be collected if you voluntarily submit it and consent to Us using it for the purposes set out in section 5, for example, when signing up for an Account. Depending upon your use of Our Site, we may collect some or all of the following data:

- 3.1 Name;
- 3.2 Date of birth;
- 3.3 Gender;
- 3.4 Business/Company name
- 3.5 Job title;
- 3.6 Profession;
- 3.7 Contact information such as email addresses and telephone numbers;
- 3.8 Demographic information such as post code, preferences, and interests;
- 3.9 Financial information such as credit / debit card numbers;
- 3.10 IP address (automatically collected);
- 3.11 Web browser type and version (automatically collected);
- 3.12 Operating system (automatically collected);
- 3.13 A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);

4. **Lawful basis for using your personal data**

- 4.1 When you appoint us to provide our services, we use your personal information because we have a contractual obligation to provide those services. If you are enquiring about our services, we still use that lawful basis because it is related to a contractual obligation that we may enter into with you.
- 4.2 If you are not a client but you have signed up to receive newsletters from us, we will only use your personal information where you have given us consent to do so.

5. **How Do We Use Your Data?**

- 5.1 All personal data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). For more details on security see section 6, below.
- 5.2 We use your data to provide the best possible services to you. This includes:
 - 5.2.1 Providing and managing your access to Our Site;
 - 5.2.2 Personalising and tailoring your experience on Our Site;

- 5.2.3 Supplying Our Services to you;
 - 5.2.4 Personalising and tailoring Our Services for you;
 - 5.2.5 Responding to communications from you;
 - 5.2.6 Supplying you with email e.g., newsletters, alerts etc. that you have subscribed to (you may unsubscribe or opt-out at any time by clicking the unsubscribe link at the bottom of each email)
 - 5.2.7 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- 5.3 In some cases, the collection of data may be a statutory or contractual requirement, and We will be limited in the products and services We can provide you without your consent for Us to be able to use such data.
- 5.4 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone, text message, or post with information, news and offers on Our Services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

6. **How and Where Do We Store Your Data?**

- 6.1 We only keep your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it. In any event, we will conduct an annual review to ascertain whether we need to keep your data. Your data will be deleted if we no longer need it in accordance with the terms of our Data Retention Policy. Our Data Retention Policy is available on request.
- 6.2 We store your most of your personal information (in particular the sensitive information) within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Some information is transferred outside the EEA, and this is always protected and controlled by us in line with GDPR requirements.
- 6.3 Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected through Our Site.
- 6.4 We ensure all data is encrypted and secure and any paper documents are secure and locked away.
- 6.2 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

7. **Do We Share Your Data?**

- 7.1 We may contract with our suppliers and service partners to provide Our services to you on Our behalf. These may include payment processing, delivery of goods, document storage, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law. For a list of the third-party companies, we use please contact us.
- 7.2 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

8. **What Happens If Our Business Changes Hands?**

- 8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 8.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes.

9. **How Can You Control Your Data?**

- 9.1 When you submit information via Our Site, you may be given options to restrict Our use of your data. We aim to give you strong controls on Our use of your data (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
- 9.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. **Your Right to Withhold Information and Your Right to Withdraw Information After You Have Given it**

- 10.1 You may access Our Site without providing any data at all.

- 10.2 You may restrict your internet browser's use of Cookies. For more information, see section 11.
- 10.3 You may withdraw your consent for Us to use your personal data as set out in section in 4 at any time by contacting Us at sara@slswillsandmore.co.uk.

11. Summary of Your Rights under GDPR

Under the GDPR, you have:

- 11.1 the right to request access to, deletion of or correction of your personal data held by Us;
- 11.2 the right to complain to the supervisory authority (the Information Commissioner's Office, the "ICO");
- 11.3 be informed of what data processing is taking place;
- 11.4 the right to restrict our use of your data;
- 11.5 the right to have your data transferred to another service provider ("data portability");
- 11.6 the right to object to our processing of your personal data;
- 11.7 rights with respect to automated decision-making and profiling (see section 14 below).

To exercise your rights or if you have any other questions about Our Site or this Privacy Policy, please contact Us at sara@slswillsandmore.co.uk

12. Automated Decision-Making and Profiling

We do not undertake any automated profiling or decision-making with your personal information. If for any reason we think it is in your interests to start any kind of automated decision-making or profiling, we will let you know.

13. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at sara@slswillsandmore.co.uk, by telephone on 01304 577998, or by post at 4 Garrity House, Miners Way, Aylesham, Canterbury, CT3 3HB. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

14. Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

15. What Cookies Do We Use and What for?

- 15.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our Services. For more details, please refer to section 5 above, and to section 15.6 below. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.
- 15.2 By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. We use third party Cookies on Our Site for tracking and lead generation. For more details, please refer to section 5 above, and to section 15.6 below. These Cookies are not integral to the functioning of Our Site.
- 15.3 All Cookies used by and on Our Site are used in accordance with current English and EU Cookie Law.
- 15.4 Before Cookies are placed on your computer or device, subject to section 15.5 below and section 15.8 below, you will be shown a pop-up, message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 15.5 Certain features of Our Site depend on Cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 15.6. Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 15.10, but please be aware that Our Site may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 15.6 The following first party Cookies may be placed on your computer or device:
There are none at the moment
and the following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
PHPSESSID	WordPress/PHP	This cookie is native to PHP applications. The cookie is used to store and identify a users' unique session ID for the purpose of managing user session on the website. The cookie is a session cookie and is deleted when all the browser windows are closed.
sc_is_visitor_unique	StatCounter Analytics	Tracking cookie used to store a random ID to avoid counting a visitor more than once.
Is_unique	StatCounter Analytics	Used to determine whether a user is a first-time or a returning visitor and to estimate the accumulated unique visits per site
Is_visitor_unique	StatCounter Analytics	Used to determine whether a user is a first-time or a returning visitor
VISITOR_INFO1_LIVE	Youtube	This cookie is used to track the information of the embedded YouTube videos on a website
IDE	Google DoubleClick	This cookie stores information about how the user uses the website and any other advertisement before visiting the website. This is used to present users with ads that are relevant to them according to the user profile.
YSC	Youtube	This cookie is used to track the views of embedded videos.
GPS	Youtube	Registers a unique ID for tracking users based on their geographical location.
catAccCookies	Cookie Consent plugin	Stores when you consented to Cookies being used on this site

15.7 Our Site uses analytics services provided by StatCounter Analytics. Website

analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. This, in turn, enables Us to improve Our Site and Our Services offered through it. You do not have to allow Us to use these Cookies, as detailed below, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

15.8 The analytics service(s) used by Our Site use(s) Cookies to gather the required information. Certain of these Cookies may be placed immediately when you first visit Our Site, and it may not be possible for Us to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below in section 15.10.

15.9 The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
sc_is_visitor	Third	StatCounter Analytics	Tracking cookie used to store a random ID to avoid counting a visitor more than once.
Is_unique	Third	StatCounter Analytics	Used to determine whether a user is a first-time or a returning visitor and to estimate the accumulated unique visits per site
Is_visitor_unique	Third	StatCounter Analytics	Used to determine whether a user is a first-time or a returning visitor

15.10 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

15.11 You can choose to delete Cookies at any time however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

15.12 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at SLS Wills and More Limited, 114 Kings Road, Aylesham, CT3 3HB or by email sara@slswillsandmore.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Signed: *Sara Sheppard*

Name: Sara Sheppard

Date: 31/12/2022 02:28:59 PM (UTC)



E-SIGN RECORD
REGISTERED. SIGNED. TIME-STAMPED.



All parties have accepted the use of electronic signature for this document and have signed as follows:

Signed By: Sara Sheppard
Date: 31/12/2022 02:28:59 PM (UTC) 31/12/2022 02:28:59 PM (Local)
Original Recipient: sara@slswillsandmore.co.uk
IP: 192.168.20.193
Message Id E6712FDFE0DAF8F0ACD1F89189C2BB3015295891
Client Code

Sara Sheppard

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Signoff Date: 31/12/2022 02:28:59 PM (UTC)
31/12/2022 02:28:59 PM (Local)