

### BACKGROUND:

Ashra Wills & Probate understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, [www.ashrawillsprobate.co.uk](http://www.ashrawillsprobate.co.uk) ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will need to read and accept this Privacy Policy when signing up for any service we offer. All services and offerings from us and all data we collect and hold for you is governed by our data privacy policy set out herein. We would like you to know about this from the beginning.

### 1. Definitions and Interpretation

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

|                        |                                                                                                                                                                                                                                                                                                                                                         |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>"Cookie"</b>        | 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 12, below;                                                                                                              |
| <b>"Cookie Law"</b>    | means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;                                                                                                                                                                                                                                                  |
| <b>"personal data"</b> | means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and |
| <b>"Services"</b>      | means the introduction by us to any of the services you have sought that we provide in any contract entered into with us or however requested;                                                                                                                                                                                                          |
| <b>"We/Us/Our"</b>     | means Ashra Wills & Probate, a Sole Trader and trading name of Nirali Ashra of 28 Grasmere Gardens, Harrow, HA3 7PU;                                                                                                                                                                                                                                    |

### 2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site or other direct dealings we may have with you. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites.

### 3. Your Rights

3.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

3.1.1 The right to be informed about Our collection and use of personal data;

3.1.2 The right of access to the personal data We hold about you (see section 10);

- 3.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 12);
- 3.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 5 but if you would like Us to delete it sooner, please contact Us using the details in section 12);
- 3.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 3.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 3.1.7 The right to object to Us using your personal data for particular purposes; and
- 3.1.8 Rights with respect to automated decision making and profiling.

#### **4. What Data Do We Collect?**

Depending upon your use of Our Site or your take up of the services we offer, we may collect some or all of the following personal and non-personal data (please also see section 11 on Our use of Cookies and similar technologies):

- 4.1 name;
- 4.2 date of birth;
- 4.3 gender;
- 4.4 business/company name
- 4.5 job title;
- 4.6 profession;
- 4.7 contact information such as email addresses and telephone numbers;
- 4.8 demographic information such as post code, preferences, and interests;
- 4.9 family details including those of any spouse, children and other relatives, and all personal information related to these covered by sections 4.1 to 4.8.
- 4.10 financial information such as credit / debit card numbers;
- 4.11 IP address;
- 4.12 web browser type and version;
- 4.13 operating system, version, device type, and system performance information;
- 4.14 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;
- 4.15 for individuals using our offerings and/or our website in connection with a community client account, business information including company name and contact information such as email, addresses and telephone numbers;
- 4.16 analytics of website usage;

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

- 5.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under GDPR at all times. For more details on security see section 6, below.
- 5.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our

legitimate interests. By contacting us to enquire about our Services it is in our Legitimate Interest to reply and you expect us to do so; by entering into an agreement with us we need to use your data in order to fulfil the contract; Specifically, We may use your data for the following purposes:

- 5.2.1 Providing information;
- 5.2.2 Providing and managing your access to Our Site;
- 5.2.3 Personalising and tailoring your experience on Our Site;
- 5.2.4 Supplying Services to you (please note that We require your personal data in order to enter into a contract with you);
- 5.2.5 Personalising and tailoring Our Services for you;
- 5.2.6 Replying to emails from you;
- 5.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the unsubscribe button and/or contacting us to tell us through [www.ashrawillsprobate.co.uk](http://www.ashrawillsprobate.co.uk) or as described in section 12 below;
- 5.2.8 Market research;
- 5.2.9 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- 5.2.10 to carry out Our obligations to you based on any service you have requested or contract we have entered into with you;
- 5.2.11 to allow you to use Our interactive features where we provide them;
- 5.2.12 to let you know about any changes to our Services;
- 5.2.13 to ensure that content we provide through our Services are presented in the most effective manner for you and for your computer and other devices;
- 5.2.14 to understand your broad, non-specific geographic location to help us identify groups of users by general geographic market (including but not limited to zip or post code, state or country);
- 5.2.15 to send you surveys for research purposes;
- 5.2.16 to maintain details of transactions with us through Services you order;
- 5.2.17 to maintain data regarding your visits to and interactions with Our Services including but not limited to traffic data, location, weblogs, and other communication data;
- 5.3 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 or telephone or text message including WhatsApp 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.
- 5.4 Any third parties (if any) whose content appears on Our Site may use third party Cookies, as detailed below in section 11. Please note that We do not control the activities of such third parties, nor the data they collect and use.
- 5.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 5.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
  - 5.6.1 Where we are obliged to preserve data in case of requirement by an authority or for litigation 6 years or longer;

- 5.6.2 Where you make an enquiry but do not proceed to enter into a contract with us 6 months;
- 5.6.3 In all other cases we delete all data once the purpose for which it was given has stopped.

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

- 6.1 We only keep your personal 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.
- 6.2 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR;

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

- 7.1 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 7.2 We may sometimes contract with third parties to supply Services to you on Our behalf. These may include payment processing, deliveries, search engine facilities, trades, 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 take all reasonable steps to 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.
- 7.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 7.4 We may sometimes use third party data processors that are located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR.

## **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. Any personal data that you have provided will, where it is relevant to any part of Our business that is being 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 that data only for the same purposes for which it was originally collected by Us.

## **9. Your Right to Withhold Information**

- 9.1 You may access Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the

collection of certain data.

9.2 You may restrict Our use of Cookies. For more information, see section 11;

## 10. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge;

## 11. **Our Use of Cookies**

11.1 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. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

11.2 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. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

11.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

11.4 Before Cookies are placed on your computer or device, you will be 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.

11.5 Our Site may use analytics services provided by Google Analytics. For more information <https://www.google.com/analytics/> Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the Services offered through it. You do not have to allow Us to use these Cookies, 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.

11.6 The analytics service(s) if any used by Our Site may use Cookies to gather the required information.

## 12. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [nirali@ashrawillsprobate.co.uk](mailto:nirali@ashrawillsprobate.co.uk) or through our website at [www.ashrawillsprobate.co.uk](http://www.ashrawillsprobate.co.uk).

## 13. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be 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.