Privacy Notice

INTRODUCTION

This is Epoq Legal Ltd's privacy notice.

We respect your privacy and are committed to protecting your personal data. This privacy notice will tell you how we look after your personal data when you visit this website (wherever you visit it from), or someone visits it for you, and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. You can also download a pdf version of the notice here.

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IMPORTANT INFORMATION AND WHO WE ARE

1. **Who this privacy notice affects**
2. This privacy notice affects:
    a. our registered customers; i.e. those that have created an account to use those products and services offered on our website that are only available to account holders; and
    b. visitors to our website to the much more limited extent that personal data about such visitors is collected automatically as a result of their interaction with our website.

3. This privacy notice also applies to the following. For some services, we treat non-account holders as customers (**deemed customers**) even though they have not registered as such. This will only be the case where, e.g., a registered customer purchases a mirror wills template or paired wills templates and one of the wills created from that template or those templates relates to a non-account holder. In these circumstances, that non-account holder will be a deemed customer. In relation to a deemed customer, any reference in this privacy notice to you completing a legal document template or entering information to complete a legal document template includes a registered customer performing these acts for a deemed customer.
4. In certain circumstances, we treat information you provide about another person as your personal data and, in these cases, you warrant that you have the consent of that other person to disclose information about them to us. This happens in the following circumstances:
    a. We have developed technology (Online by Invitation), that allows you to share a document that you have created with a third party (Invitee) online for collaboration purposes. If this technology is offered on this website, any information collected about your Invitee shall be considered to be your personal data.
    b. Similarly, any information collected about a Household Member of yours (as defined in the Terms of Use) shall be considered to be your personal data.
    c. When you complete one of our automated legal document templates, you may include information about another person. We will treat that information as your personal data.
5. Any reference, therefore, in this privacy notice to you or your personal data shall concern only registered customers, deemed customers and (to a limited extent) visitors.
6. **Purpose of this privacy notice**
7. This privacy notice gives you information about how Epoq Legal Ltd collects and deals with your personal data when you use this website. In this privacy notice, we use the word **process** to cover all the different ways in which we handle your personal data, such as collection, use, storage and transfer.
8. This website is not intended for children and we do not knowingly collect data relating to children.
9. It is important that you read this privacy notice, as well as any other privacy notice we may give you on specific occasions when we are processing personal data about you, so you know how and why we are using your personal data.
10. **Controller**
11. Epoq Legal Ltd (referred to as **we**, **our**, **us** in this privacy notice) is the **controller**. In

other words, we decide when, why and how to process your personal data and we are responsible for looking after it and protecting your rights. Other organisations may also be a data controller of some of your personal data for specific purposes (see section 5).

12. We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.
13. **Contact details**
14. Our full details are:

    Full name of legal entity: Epoq Legal Ltd

    Data privacy manager: dataprivacy@epoq.co.uk

    Postal address: 2 Imperial Place, Maxwell Road, Borehamwood, Hertfordshire, WD6 1JN
15. You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us first.
16. Epoq Legal Ltd is authorised and regulated by the Solicitors Regulation Authority (SRA number 645296).
17. **Changes to the privacy notice and your duty to inform us of changes**
18. This version was last updated on 24/03/2022.
19. It is important that the personal data we hold about you is accurate and current. Please tell us if your personal data changes during your relationship with us.
20. **Third-party links**
21. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third parties and are not responsible for how they deal with your personal data, so we encourage you to read their privacy notices before allowing them to process your personal data.

THE DATA WE COLLECT ABOUT YOU

1. Personal data means any information about an individual from which that person can be

identified. It does not include data where the identity has been removed (**anonymous data**).

2. We may process different kinds of personal data about you (including information about your Invitees) which we have grouped together as follows:
    a. **Contact Data** includes address, email address and telephone numbers.
    b. **Identity Data** includes name(s), date of birth, gender and photographic identification.
    c. **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
    d. **Profile Data** includes, your interests, preferences, feedback and survey responses.
    e. **Service Data** includes your username and password, security questions, and identifiers and metadata specific to you.
    f. **Support Data** includes information passing between you and support teams in connection with the provision of services you have requested.
    g. **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
    h. **Template Data** includes information you enter when completing our automated legal document templates.
    i. **Transaction Data** includes details about payments to and from you and details of products and services you have purchased from us.
    j. **Usage Data** includes information about how you use our website, your session activity, and how you use our products and services.

3. When (if applicable) you purchase a product or service on this website, the payment is processed by a payment gateway service. Some information is passed back to us by the payment gateway service - for card purchases, this includes your name, the last 4 digits of the card and its expiry date; for direct debits, this includes a payment mandate identifier and payment dates. Otherwise, we do not store your financial data, such as bank account and payment card details.
4. We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or the frequency with which

certain enquiries are made, so that we develop resources to deal with common questions more efficiently. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

5. When you complete some of our automated legal document templates, you may have to, or choose to, provide **Special Categories of Personal Data** about yourself in order to complete your document fully. Special Categories of Personal Data include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. For example, when you use one of our templates to make a will, you will be asked about your capacity to sign. In these cases, unless otherwise authorised by data protection law, you will be asked to consent to us processing this kind of information about you (for the purpose only of creating your document) before being asked to provide it. If you do not give your consent when necessary, you may not be able to complete your document. Otherwise, we do not collect any Special Categories of Personal Data about you. Nor do we collect any information about criminal convictions and offences.
6. **If you fail to provide personal data**
7. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

1. We use different methods to collect data from and about you including through:
    a. **Direct interactions**. You may give us your personal data by filling in forms on this website; by uploading documents to this website; by corresponding with us by post, phone, email or otherwise; or when entering information to create a legal document. This includes personal data you provide when you:
        i. create an account on our website;
        ii. purchase a product or service (if applicable);
        iii. subscribe to a service (if applicable);
        iv. use or enquire about our products or services;
        v. request marketing or our publications to be sent to you;

vi. enter a competition, promotion or survey; or

vii. give us some feedback.

b. **Automated technologies or interactions**. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns and Usage Data about how you use our products and services. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookie notice for further information.

c. **Third parties**. We may receive personal data about you from various third parties or publicly available sources as set out below:

1. Technical and Usage Data from analytics providers such as Google based outside the UK.

2. Identity and Contact Data from organisations based inside the UK that have facilitated your access to our products and services. This may be because of an existing relationship you have with that organisation; for example, where an employer, membership organisation or insurer arranges for its employees, members or insured to have access to our products and services. Or, it may be the result only of an introduction that you have asked them to make. Such organisations may share your Identity and Contact Data with us via a single sign-on mechanism, which allows an account to be created for you on this website without you having to input your details.

3. If you are a deemed customer, we may receive Identity and Contact Data, Support Data and Template Data about you from the associated registered customer.

2. When we obtain information about you from third parties or publicly available sources rather than from you directly, we will notify you of any relevant information obtained, for example, the type of personal data, within a reasonable period.

HOW WE USE YOUR PERSONAL DATA

1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

a. Where we need to perform the contract we are about to enter into or have entered into with you. **Performance of Contract** means processing your personal data where it is necessary for the performance of a contract that we have with you or to take steps at your request before entering into such a contract.

b. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. **Legitimate Interests** means our interests in developing our business, products and services; protecting our business; and managing it efficiently. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do 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 to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

c. Where we need to comply with a legal or regulatory obligation. **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

2. We may share Template Data that you give to us when completing one of our automated legal document templates with third parties so that they can provide a service or assistance that you have requested. For example, when you create a document on this website, we may offer the facility for you to request that the document be reviewed by a lawyer of your choice. If you request this review service, using the Online by Invitation technology, the lawyer can be given online access to your electronic document file, and the associated questionnaire that you completed, so that the lawyer may undertake the requested review. This technology may be used in other circumstances, but it will only ever be used to share your document with a third party so that the third party can provide a service or assistance that you have requested. We rely on consent as a legal ground for processing your personal data in this way.
3. We rely on consent as a legal ground for processing your personal data in relation to notifying our insurers about any claim you may make against us or about any circumstances that may give rise to a claim by you against us.
4. We also rely on consent as a legal ground for processing your personal data in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw your consent to receive such communications at any time. You can do this by editing your preferences yourself from the 'My Account' page of this website or, alternatively, by contacting us.
5. We also rely on consent as a legal ground for processing your personal data in relation to the disclosure of your information to external firms or organisations who conduct audit or quality checks on us.

6. Generally, however, we do not rely on consent as a legal ground for processing your personal data except in the circumstances described above.
7. **Purposes for which we will use your personal data**
8. We have set out below a description of all the ways we plan to use your personal data, and which of the legal grounds we rely on to do so. We have also identified what our legitimate interests are where appropriate.
9. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below.

Purpose/Activity	Legal ground for processing and (where applicable) nature of legitimate interest
To create, validate and (if necessary) recover an account for you, we will process Contact Data and Identity Data	• Performance of a contract with you where we have contracted directly with you as an individual/consumer, sole trader or a general or limited partnership • Necessary for our legitimate interests where you are acting on behalf of an incorporated business (to perform a contract with that incorporated business)
To provide or perform the product or service you have requested, we will process Contact Data, Identity Data, Service Data, Support Data and Template Data	• Performance of a contract with you where we have contracted directly with you as an individual/consumer, sole trader or a general or limited partnership • Necessary for our legitimate interests where you are acting on behalf of an incorporated business (to perform a contract with that incorporated business) • Where this involves processing Special Categories of Personal Data, we will obtain your explicit

	consent
To provide management information (including Contact Data, Identity Data and Usage Data) to any organisation that has facilitated your access to this website	Necessary for our legitimate interests (for running our business and to meet our contractual obligations to that organisation)
To share Template Data with third parties at your request using the Online by Invitation functionality	Consent
To manage payments (where applicable), we will process Contact Data, Identity Data, Service Data and Transaction Data	• Performance of a contract with you where we have contracted directly with you as an individual/consumer, sole trader or a general or limited partnership • Necessary for our legitimate interests where you are acting on behalf of an incorporated business (to perform a contract with that incorporated business)
To make statutory returns and for legal and regulatory compliance, we will process Contact Data, Identity Data and Support Data	Necessary to comply with a legal obligation
To manage our relationship, which will include: a. Notifying you about changes to our terms of business or privacy notice and sending other service communications to you Asking you to complete a survey, we will process Contact Data,	1. Performance of a contract with you where we have contracted directly with you as an individual/consumer, sole trader or a general or limited partnership 2. Necessary for our legitimate interests where you are acting on behalf of an incorporated business (to perform a contract with that incorporated business) 3. Necessary to comply with a legal or regulatory obligation 4. Necessary for our legitimate

Identity Data and Support Data	interests (to keep our records updated, to evaluate client feedback for the purposes of developing and growing our business, and to protect our business)
To collect and recover money owed to us, we will process Contact Data, Identity Data, Service Data and Transaction Data	Necessary for our legitimate interests (to recover debts due to us)
To be able to respond to or defend complaints and claims, we will process Contact Data, Identity Data, Support Data, Template Data, Transaction Data and Usage Data	1. Necessary for our legitimate interests (to protect our business) 2. Consent in relation to the disclosure of personal data to our insurers in connection with notified claims or circumstances
To participate in quality assurance schemes involving external firms or organisations conducting audits or quality checks.	Consent
To send marketing communications to you by email or text message, we will process Contact Data, Identity Data and Marketing and Communications Data, Profile Data, Support Data, Transaction Data and Usage Data	Consent
To ensure that we do not send marketing communications to you if you have indicated that you do not wish to receive these, we will process Contact Data, Identity Data, and Marketing and Communications Data	Necessary to comply with a legal obligation
To send legal bulletins to you by email, we will process Contact Data, Identity Data and Marketing and Communications Data	Necessary for our legitimate interests (to support our products/services and to grow our business)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), we will process Contact Data, Identity Data, Service Data and Technical Data	1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) 2. Necessary to comply with a legal obligation
To identify possible developments and improvements to our website, products/services, marketing, customer relationships and experiences, we will process Contact Data, Identity Data, Profile Data, Support Data, Technical Data, Transaction Data and Usage Data	Necessary for our legitimate interests (to study how customers use our products/services, to develop them and to inform our business development strategy)
To make suggestions and recommendations to you about products or services that may be of interest to you, we will process Contact Data, Identity Data, Profile Data, Support Data, Transaction Data and Usage Data	Necessary for our legitimate interests (to develop our products/services and grow our business)
To determine whether data entered on this website (e.g. information entered into a contact form) is being provided by a human user or by an automated program, we use Google reCAPTCHA, which processes Technical Data.	Necessary to comply with a legal obligation

10. **Marketing to registered customers**

11. We may use your Contact Data, Identity Data, Profile Data, Support Data, Transaction Data and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

12. You may receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you

have not opted out of receiving that marketing.

13. You can ask us to stop sending you marketing messages at any time by editing your preferences from the 'My Account' page of this website or by following the opt-out links on any marketing message sent to you or by contacting us at any time.
14. **Marketing to deemed customers and visitors**
15. We do not market to deemed customers or visitors.
16. **Third-party marketing**
17. We do not share your personal data with any outside company for marketing purposes.
18. **Cookies**
19. Please see our cookie notice for further information.
20. **Change of purpose**
21. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
22. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal ground which allows us to do so.
23. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

1. We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:
    a. Our service providers based in the UK and the Republic of Ireland who provide IT and system administration services.
    b. Any organisation that has facilitated your access to this website.
    c. If you have accessed our services through a website that we do not operate, the operator of that website is a data controller of your personal data for the purpose of administering that website and delivering any other services offered to you on that website.
    d. GoCardless. If applicable, GoCardless processes direct debit payments made for the subscription services offered on our website. GoCardless is a data controller

of some of your personal data for this purpose. It processes that personal data in accordance with its own privacy notice, which can be found here.

e. Other service providers based in the UK providing services offered on our website direct to you.

f. Some of the personal data that we hold about a deemed customer in the circumstances described in section 3.1(c)(iii) (i.e. that which can be viewed or accessed from the associated registered customer's account page) is necessarily shared with the associated registered customer.

g. An Invitee of yours with whom you share Template Data using the Online by Invitation functionality.

h. Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

i. HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

j. External firms or organisations for the purpose of conducting audit or quality checks on us. These external firms and organisations are required to maintain confidentiality in relation to your personal data.

k. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

l. The data collected during the analysis performed by Google reCAPTCHA of the behaviour of each website visitor is encrypted and forwarded to Google. Google's privacy policy can be found at: https://policies.google.com/privacy.

2. We require all third-party service providers processing your personal data for us to respect the security of your personal data and to treat it in accordance with the law. We do not allow them to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

1. We do not transfer your personal data outside the UK or European Economic Area except, subject to appropriate safeguards, to you or as management information to any organisation that has facilitated your access to this website.

DATA SECURITY

1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

1. **How long will you use my personal data for?**
2. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements or to be able to respond to or defend complaints and claims.
3. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
4. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.
5. In some circumstances you can ask us to delete your data: see below for further information.
6. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

1. Under certain circumstances, you have rights under data protection laws in relation to your personal data.

2. You have the right to:

    a. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

    b. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

    c. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

    d. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

    e. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations:

        i. if you want us to establish the data's accuracy;

        ii. where our use of the data is unlawful but you do not want us to erase it;

        iii. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

        iv. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

    f. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

g. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

3. If you wish to exercise any of the rights set out above, please contact us.
4. **No fee usually required**
5. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
6. **What we may need from you**
7. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
8. **Time limit to respond**
9. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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