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INHERITAGE PRIVACY POLICY

We take your privacy very seriously. Please read this privacy notice 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.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR).

Your guide to our privacy notice

This privacy notice is provided in a layered format to allow you to navigate it easily. The privacy notice is split into the following sections:

- **Section 1, Key terms**: this section provides you with useful definitions of the key terms used in this notice, so that you can understand it.
- **Section 2, The controller of your personal data**: this section provides details of the InHeritage Group so that you can identify the controller of your personal data.
- **Section 3, Personal data we collect about you**: this section provides you with details of the types of personal data which we may collect and process about you.
- **Section 4, How your personal data is collected**: this section provides you with information about how we collect your personal data.
- **Section 5, How and why we use your personal data**: this section provides you with information on how we process your personal data, including the purposes for which we process personal data (and the legal bases on which we rely to process it). This section also provides details about our processing of special category personal data, and our processing of personal data for direct marketing purposes.
- **Section 6, Who we share your personal data with**: this section provides you with details of third parties with whom your personal data may be shared.
- **Section 7, How long your personal data will be kept and data security**: this section provides you with information about the criteria we use to determine how long your personal data will be kept for, and also the measures we take to seek to ensure that your data is secure.



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- **Section 8, International transfers of personal data**: this section provides you with information about transfers of your personal data outside of the UK by us.
- **Section 9, Your rights**: this section provides you with information about your rights under data protection law, including your right to complain.
- **Section 10, How to contact us**: this section provides you with our contact details, so that you can contact us should you have any questions about this privacy notice.

This privacy notice was last updated in January 2026. We may change this privacy notice from time to time at our discretion.



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Section 1 - Key terms

In this policy, the following terms have the following meanings:

- **"InHeritage Group", "we", "us", "our"** means the companies and other corporate entities from time to time comprising the InHeritage group of companies. For a full list of the members of the InHeritage Group click [here](#);
- **"Personal data"** means any information relating to an identified or identifiable living individual and could include, for example, a name, address, email address or other information;
- **"Special category personal data"** means personal data which applicable data protection law recognises needs additional protection due to its sensitivity including personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic data, biometric data (where used for identification purposes), and data concerning health, sex life or sexual orientation; and
- **"Data subject"** means the person who the personal data relates to.

Section 2 - The controller of your personal data

The controller of your personal data is the entity which, alone or jointly with others, determines the purposes and means of the processing of your personal data.

We have included details of the members of the InHeritage Group in **Section 1 (Key Terms)**. The member(s) of the InHeritage Group which act as a controller of your personal data will depend on the circumstances for which you engage with the InHeritage Group and/or provide your personal data to InHeritage Group. For example, if you enter into an engagement letter for services with InHeritage Limited, InHeritage Limited will be the controller of your personal data. Similarly, if you enter into an engagement letter for services with Just Wills Group Limited, Just Wills Group Limited will be the controller of your personal data. There may be circumstances where more than one member of the InHeritage Group is a controller of your personal data. If you would like further information on who the specific controller(s) of your personal data are, then please contact us at enquiries@inheritage.uk.

Section 3 - Personal data we collect about you

The personal data we collect about you depends on the particular products and services we provide to you. The products and services we provide include will writing, lasting powers of attorney, document storage and



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other bereavement related products and services. We will collect and use the following personal data about you:

Identity data, which may include your name, your gender and pronoun preference and your date of birth;

Contact data, which may include your email address, telephone number and address;

KYC data, which is information to check and verify your identity and to undertake credit and financial checks. This could include your date of birth, copies of identification documents such as passports, driving licences and utility bills, together with information which may be revealed by anti-money laundering searches and/or other background searches conducted on you;

Family data, including details of your marital status, family, beneficiaries, executors and attorneys (including names, relationships, dates of birth and contact details);

Financial data, including details of your assets, liabilities and tax status, together with your billing information, transaction data and payment card information;

Estate data, means information which you provide to us about your estate, which is likely to include Financial Data (see above), Family Data (see above), and other information you provide to us for the purposes of us providing will writing and other bereavement related products and services to you;

Health data, we collect information about your health (where relevant for powers of attorney or estate planning);

Service data, including your contact history, details and copies of correspondence with us (including when you complete forms on our website) and details of the products and services which we provide to you;

Technical data, including information about how you use our website (including, where relevant, login information to our customer portal and details which you upload to our customer portal), IT, communication and other systems, including internet protocol (IP) address, mail server URL, MIME version, 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 when you correspond with us. We also use cookies on our website. For more information on our use of cookies, please see our **cookie policy**;

Recordings, we collect data recorded from telephone calls and/or in meetings including for the purposes of recording your instructions, training, quality monitoring, and resolving queries or disputes; and



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Marketing data, including your preferences to receive marketing communications, your contact information for marketing purposes and your responses to surveys, competitions and promotions.

We also collect information provided to us by email or post, during telephone calls and/or in meetings with you. For example, we may collect other miscellaneous information which we require to carry out our services and provide products to you, such as information related to your estate, assets, beneficiaries, family members or relating to your involvement in the estate of someone who has died.

We collect and use this personal data for the purposes described in **Section 5 (How and why we use your personal data)**. If you do not provide personal data we ask for, it may delay or prevent us from providing products and services to you.

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed.

Section 4 - How your personal data is collected

We collect most personal data directly from you either in person, by telephone, text or email and/or via our website or website/customer portal. We may also collect information:

from publicly accessible sources, such as Companies House or HM Land Registry;

from third parties, such as background check providers, sanctions screening providers, credit reference agencies and customer due diligence providers, your bank, mortgage broker, financial advisor or building society, as well as data suppliers and data cleansers as appropriate;

from cookies on our website—for more information on our use of cookies, please see our **cookie policy**; and

via our IT system, including through automated monitoring of our websites and other technical systems, such as our computer networks and connections, from recording telephone calls and meetings, and from access control systems, communications systems, email and instant messaging systems.

Section 5 - How and why we use your personal data

Under data protection law, we can only use your personal data where we have an appropriate lawful basis to use it. The legal bases which we principally rely on are the following:

to comply with our legal and regulatory obligations;



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for the performance of a contract with you or to take steps at your request before entering into a contract with you;

for our legitimate interests or those of a third party, so long as those interests are not overridden by your own rights and interests; and

with your consent.

The table below explains what we use your personal data for and why.

What we use your personal data for	Legal basis for processing	Type of data processed
Providing, or facilitating the provision of, products and services to you	To perform our contract with you or to take steps at your request before entering into a contract with you	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Health data, Service data, Recordings
To administer and manage our relationship with you, including managing payments, fees and charges and recovering money owed to us	To perform our contract with you or to take steps at your request before entering into a contract with you For our legitimate interests, of pursuing and developing our business	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Service data
Preventing and detecting fraud and other crimes against you or us	For our legitimate interests, to minimise fraud that could be damaging for you and/or us	Identity data, KYC data, technical data, Service data, Recordings
Conducting checks to identify our clients and verify their identity, and other screening checks including for financial and other sanctions or embargoes, and to conduct credit checks	To comply with our legal and regulatory obligations For our legitimate interests, of ensuring the identity of our clients and our ability to provide services to them (and	Identity data, Contact data, KYC data, Family data, Service data



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What we use your personal data for	Legal basis for processing	Type of data processed
	their ability to pay for the services where relevant)	
Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations For our legitimate interests, of ensuring we comply with applicable law and maintain our accreditation	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Service data, technical data
To enforce legal rights or defend or undertake legal proceedings	To comply with our legal and regulatory obligations For our legitimate interests, to protect our business, interests and rights	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Service data, Recordings
Gathering and providing information required by or relating to audits, statutory returns, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations For our legitimate interests, including to maintain our accreditations	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Service data, Recordings
Operational and business administration reasons, such as ensuring business policies are adhered to, improving efficiency, training and quality control, ensuring the confidentiality of commercially sensitive information, and generally to	For our legitimate interests, to manage and administer our business effectively, including so we can deliver services to you	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Service data, technical data, Recordings



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What we use your personal data for	Legal basis for processing	Type of data processed
manage and administer the activities of our business		
Statistical analysis to help us manage or improve our business, for example in relation to our financial performance, customer base, product and service offering range or other efficiency measures. We may also aggregate and anonymise our records.	For our legitimate interests, to be as efficient as we can so we can deliver the best products and services to you	Identity data, Contact data, Estate data, Service data
Preventing unauthorised access to our systems and ensuring the security of the systems and data stored on them	For our legitimate interests, to prevent and detect suspicious or criminal activity that could be damaging for you and/or us To comply with our legal and regulatory obligations, including under applicable data protection laws	Identity data, Contact data, Service data, technical data
Updating, enhancing, structuring and consolidating client records and databases (including, where required, transferring data in accordance with Section 6 (Who we share your personal data with))	To perform our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests, to ensure the data we hold is accurate and to enable us to	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Health data, Service data, Marketing data



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What we use your personal data for	Legal basis for processing	Type of data processed
	access and use client data for our business purposes	
To use AI tools in connection with our services	In most cases, for our legitimate interests, to improve productivity and accelerate the delivery of our services. In some cases (in relation to specific services), with your consent	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Service data, technical data
Marketing our products and services and those of selected third parties.	With your consent For our legitimate interests, to promote our business to existing, former and potential clients	Identity data, Contact data, Marketing data
We may conduct profiling, including for marketing purposes, so that we can provide you with details of products and services which we believe may be of interest to you.	With your consent For our legitimate interests, to promote our business to existing, former and potential clients	Identity data, Contact data, Family data, financial data, Estate data, Service data, Marketing data
To share your personal data with members of our group, including as part of our reporting activities on InHeritage Group's performance, as part of intra-group service arrangements, in order to consolidate	For our legitimate interests, to allow us to effectively manage and administer our business	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Health data, Service data, technical data, Recordings, Marketing data



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What we use your personal data for	Legal basis for processing	Type of data processed
services and systems on a group-wide basis (including for efficiencies), and to manage, structure and consolidate our client databases including in connection with the hosting, management, analysis and use of data to support business activities		
To share your personal data with relevant third parties, including service providers, regulatory and other authorities and selected third party partners and businesses. Please refer to Section 6 (Who we share your personal data with) for further details of the purposes for which we share personal data with these third parties.	To comply with our legal and regulatory obligations For our legitimate interests, to provide services to you and to protect, realise and grow our business In certain circumstances, for your legitimate interests, including so that you can receive additional services (from third parties) related to the services which we provide	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Health data, Service data, technical data, Recordings, Marketing data
To share your personal data with third parties (including professional advisers) in connection with the actual or potential acquisition and/or restructuring of some or all of our business or assets	For our legitimate interests, and the legitimate interests of our shareholders, of realising the value of the business and supporting the growth of the business	Identity data, Contact data, KYC data, Family data, financial data, Estate data, Health data, Service data, technical data, Recordings, Marketing data



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What we use your personal data for	Legal basis for processing	Type of data processed
To record telephone calls and/or meetings for the purposes of accurately taking instructions, training, quality monitoring, and resolving queries or disputes	For our legitimate interests, to enable us to provide a high quality of services, and to protect and defend against legal claims	Recordings (and any other data you share with us in calls and meetings including Service Data)

Special category personal data

Certain personal data we collect is treated as a special category to which additional protections apply under data protection law. We will only process your special category personal data where it is necessary to do so to provide services to you (for example, where you provide special category personal data to us for the purposes of completing your will). Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws. For example, where:

we have your explicit consent;

the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or

the processing is necessary to establish, exercise or defend legal claims.

Marketing

We may use your personal data to send you updates, information and other marketing (by email, text message, telephone and/or post) about products and services, including offers, promotions and details of products and services. The products and services which we market to you may include our own products and services, and the products and services of selected partners and third parties.

The legal basis which we principally rely on to send electronic marketing information (by email, text message and telephone) is that we have your consent to send such information. We may also send you marketing information (by email, text message, telephone or post) where it is in our legitimate interests to do so (where such interests are not overridden by your rights or interests).



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You have the right to opt out of receiving marketing communications at any time by:

contacting us at enquiries@inheritage.uk; and/or

using the 'unsubscribe' link in emails or 'STOP' number in texts.

We may from time to time ask you to confirm or update your marketing preferences including if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

Artificial Intelligence (AI) and Automated Decision Making

We use AI in our business to assist us to produce documentation, manage meetings, conduct day-to-day office tasks, carry out due diligence, undertake legal research and draft emails and advice notes. In addition, our IT systems may use AI tools to improve efficiency (for example, our customer relationship management system may use various AI tools). The legal basis that we principally rely upon to process personal data using AI tools is that it is in our legitimate interests to do so, including to improve productivity and accelerate the delivery of our services.

We may fully automate the production of certain legal and other documents for you (e.g. simple wills), which may include profiling. This will be an opt-in service, which our clients may choose to instruct including given the comparatively low cost of this service (as compared to services which are provided using additional human input/resources). The use of AI and automated decision making for these purposes will have an impact on the work product provided to you. In order to ensure these services are provided to the best standard, we suggest you ensure that any information you provide to us is complete and accurate. We will obtain your consent before we use automated decision-making tools if this will have a significant impact on or legal consequences for you (such as preparing wills without human input/involvement).

Other than in this scenario described above (where you have opted-in to receive an automated service), you will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Section 6 - Who we share your personal data with

We may share your data with third parties, including third-party service providers, regulatory bodies and other authorities, and other entities in our group, including where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so. For example, we may share your personal data as follows:



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- **Intra group:** we may share your personal data with other members of the InHeritage Group for various reasons, including to allow us to effectively manage and administer our business, as part of reporting activities on InHeritage Group's performance, as part of intra-group service arrangements, in order to consolidate services and systems on a group-wide basis (including for efficiencies), and to manage, structure and consolidate our client databases including in connection with the hosting, management, analysis and use of data to support business activities.
- **Third parties:** we may share your personal data with third parties to help deliver our products and services and conduct our business activities. Third parties we may use include the following:
 - software-as-a-service providers and other IT service providers (including those who provide AI tools);
 - payment service providers;
 - backup and disaster recovery providers;
 - printing companies, document storage providers (including to store wills, lasting powers of attorney and related documents) and delivery companies;
 - data suppliers and data cleanser providers;
 - probate and estate administration companies;
 - PR and marketing agencies;
 - website hosting providers and website maintenance service providers;
 - background, compliance, anti-money laundering and/or credit reference services and agencies;
 - insurers, re-insurers and brokers;
 - banks;
 - providers of artificial intelligence products and tools (and related services);
 - telephone service providers;
 - other professional services providers, such as lawyers and tax advisers;



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- debt collection companies (to assist us in recovering monies owed to us); and
- third parties approved by you.
- **Our partners and businesses we think may be of interest to you:** we may share your personal data with third party partners and businesses, for the purpose of those third parties providing products and services to you. Examples include probate and estate administration companies, insurance providers and other law firms who may provide specialist advice.
- **Regulatory and other authorities, including government agencies:** we may share your information in order to comply with legal and regulatory obligations to which we are subject and to provide services to you. Examples include the Office of the Public Guardian (to register lasting powers of attorney), the Land Registry Office (to submit changes in title required to support your will), HMRC and local authorities (to comply with court orders and other legal obligations).
- **Auditors:** we may share your information with our external auditors, for example in relation to the audit of our accounts.
- **Law enforcement agencies, courts, tribunals:** we may have to share your personal data with law enforcement agencies, courts and tribunals to comply with the law and/or to enforce legal rights or defend or undertake legal proceedings.
- **Third party purchasers:** we may need to share your personal data with other parties that have or may acquire control or ownership of our business (and our professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency.

Where these third parties act as our data processor (i.e. where they act on our behalf to process the personal data) we impose contractual obligations on them as required by law, including to ensure they can only use your personal data for agreed purposes.

Occasionally, the third parties above may need to share your personal data with other third parties for their own purposes (e.g. they may need to share your personal data with their own software-as-a-service providers or with their own professional advisers).

If you would like further information about the third parties with whom your personal data is shared, please contact us at enquiries@inheritage.uk.



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Section 7 - How long your personal data will be kept and data security

We retain personal data in accordance with our retention policy. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. 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 that personal data, the purposes for which we process that personal data and whether we can achieve those purposes through other means as well as the applicable legal and regulatory requirements. Please note that our legal obligations generally require us to store data indefinitely.

We have appropriate security measures to seek to prevent personal data from being lost accidentally, or used or accessed unlawfully, but we cannot guarantee the security of any data we collect and store. We also have procedures to deal with personal data breaches. 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 information on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Section 8 – International transfers of personal data

It is sometimes necessary for us (and the third parties which we use to provide the services) to transfer your personal data to countries outside the UK and EEA. For example, external service providers used by InHeritage Group may be based (or carry on processing of personal data) outside of the UK or EEA so their processing of your personal data may involve a transfer of personal data outside of the UK or EEA.

Where we transfer your personal data outside the UK or EEA we will ensure that we comply with applicable data protection law, including by ensuring that personal data is protected in a manner that is consistent with how your personal data will be protected in the UK or EEA. We usually do this by ensuring that an adequacy decision (by applicable data protection authorities) has been made in relation to the relevant recipient country, or by implementing appropriate safeguards (for example, standard contractual clauses approved by applicable data protection authorities) in relation to the transfer. Please contact us if you would like further information on the specific safeguards we use when transferring your personal data out of the UK or EEA.

Section 9 – Your rights

You have the following rights under data protection law:

- **Access (commonly known as a "data subject access request"):** you have the right to be provided with a copy of your personal data.



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- **Rectification:** you have the right to require us to correct any mistakes in your personal data. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Erasure (also known as the right to be forgotten):** you have the right to require us to delete your personal data in certain situations. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object:** you have the right to object to us processing your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Data portability:** you have 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.
- **Restriction of processing:** you have the right to require us to restrict processing of your personal data in certain circumstances. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Not to be subject to automated individual decision making:** you have 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. Please see **Section 5 (How and why we use your personal data)** for details of how we use AI in our business.
- **The right to withdraw consent:** If you have provided us with consent to use your personal data you have a right to withdraw that consent at any time. You may withdraw consent by emailing us at **enquiries@inheritage.uk**. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

For more information on each of those rights, including the circumstances in which they apply, please contact us at **enquiries@inheritage.co.uk**. The ICO website also has useful guidance on exercising data subject rights, which you may wish to refer to.



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You will not usually 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.

If you would like to exercise any data subject rights, you can contact us at **enquiries@inheritage.uk** or by post using the details in **Section 10 (How to contact us)**. We kindly request that you provide enough information to identify yourself (and any additional identity information we may reasonably request from you) and let us know what right you want to exercise and the information to which your request relates.

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.

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.

You also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator) and/or the relevant supervisory authority in your jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach the applicable data protection authority so please contact us in the first instance. We will acknowledge complaints within 30 days and respond to them without undue delay. If you need our assistance with making a complaint, please let us know.

Section 10 - How to contact us

You can contact us by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

- **Post:** InHeritage Group Limited, Windmill Road, St Leonards on Sea, East Sussex, England TN38 9BY
- **Email:** enquiries@inheritage.uk