

A large, bold, white sans-serif title "Privacy Policy" centered at the bottom of the page. The background of the entire page is a high-angle photograph of a silver laptop on a dark surface, with a pair of glasses and a magnifying glass resting on it. A brass gavel is partially visible in the top left corner.

Privacy Policy

Introduction

Pepperells Limited (we, us, our) takes your privacy very seriously. We ask that you read this privacy policy carefully as it contains important information about what to expect when Pepperells Limited collects personal information about you and how [data controller] will use your personal data.

Pepperells Limited is part of a group and is affiliated with Pepperells Wealth Limited (Company Number 11065733) (the “affiliate company”).

1. This policy applies to information we collect, namely:

- Visitors to our website– we may log your IP address (which indicates the location of your computer on the internet) for the purpose of systems administration, statistical purposes and troubleshooting;
- We may record if you contact us via telephone, fax, email or post for the purpose of systems administration, and statistical purposes.
- We may collect information from people who do business with us or register for any of our services;
- If you provide your email address in order to submit an enquiry, comment or request for further information, we may contact you regarding your enquiry, comment or request.
- Job applications – In particular, it should be noted that in relation to our careers section of www.pepperells.com, if you choose to provide us with a completed application form, a covering letter containing any Personal Data or other personal details, a curriculum vitae or any combination of these documents whether in hard copy, electronic or any other format, the information will be used by us for the purpose of determining your suitability for employment with us. We shall hold the information provided for a period of 12 months, and may contact you during that time regarding it. Following this period, the information we hold will be destroyed. By submitting any of these documents to us, you consent to us using them as described above.

Your Personal Details

2. The information we collect about you:

When you do business with us/register for our service we collect the following personal information from you:

- Your name (Company if business);
- Postal address, email address, telephone number, credit card number and expiry date(if required);
- Any identity information (including but not limited to), financial information, employment status, data about criminal convictions or offences, details of any vulnerability, details of your dependants and/or beneficiaries, lender information, mortgage information,
- Any other information which we need to collect for the specific purpose in question.
- How we will use the information about you

We gather this information so as to allow us as applicable to process your registration, process any orders you may make, and provide a relevant legal service as instructed. We never instruct a third party or incur any costs to your legal matter without first seeking your specific consent. Based on your status or legal position and the service you require (i.e. when you inform us of the purpose of our instruction), we may contact you about other legal services which will assist you but you are not obliged to proceed to instruct us on that separate matter. We (or our affiliate company) may contact you regularly every few years to review or update your matter and to consider your ongoing legal position.

The relevant information is then used by us or our affiliate company, our agents, and third party agencies to provide you with legal advice or services and to communicate with you on any matter relating to the conduct of your matter(s) and the provision of our services in general.

From time to time we (or our affiliate company) may provide your information to our marketing or IT departments for research and analysis purposes so that we can monitor and improve the services we provide. We may occasionally contact you by post, email or telephone to ask you for your feedback and comments on our services.

We operate a system to ensure that all client feedback is dealt with fairly and consistently and is properly recorded. If you think that our service could be improved or would like to provide any additional comments, please contact us.

We will not sell, distribute or lease your Personal Data to third parties, except with your permission or as required by law.

Any information collected for statistical purposes will not include information that can be used to identify you.

The table below provides a legal basis and reasons for processing your data and in what circumstances your data may be reviewed or shared with external agencies.

Rationale for Processing your data	Lawful Basis for Processing your data	Third party recipients linked to that activity whom we may need to share your information with
<p>To manage complaints received from a client</p> <p>To assess the suitability of any advice provided to you and/or the competency of your adviser in compliance with our monitoring and oversight obligations</p> <p>To identify any commission or fee payments due to your adviser as a result of the</p>	<p>Compliance with a legal obligation</p>	<p>Your legal adviser</p> <p>The Information Commissioner’s Office</p> <p>The Legal Ombudsman Service</p> <p>The Solicitors Regulation Authority</p> <p>Lender/product provider</p> <p>Our professional indemnity insurers and insurance adviser</p>

<p>service they have provided to you</p>		<p>Our external solicitors or counsel</p> <p>External consultants/advisers to assist in assessing complaints</p> <p>Our Affiliate Company</p> <p>External Auditing and accreditation organisations such as Lexcel / Legal Aid</p>
<p>To trace your whereabouts to contact you about any ongoing matter in which you are involved to you</p>	<p>Compliance with a legal obligation to maintain accurate records</p>	<p>Tracing agents</p> <p>Process Servers</p>
<p>to retain records of any services or advice provided to you by your adviser in accordance with our regulatory obligations</p>	<p>Compliance with a legal obligation – includes storage of any original documents / deeds (such as Wills)</p>	<p>External supplier(s) of data storage and data hosting services to retain records on our behalf</p> <p>Work Flow (on a cloud)</p>
<p>To manage legal claims</p> <p>To perform administrative tasks in relation to the use of your data</p>	<p>Legitimate interests – we have a legitimate interest in protecting our organisation from breaches of legal obligations owed to us and to defend ourselves from litigation. This is needed to ensure that our legal rights and interests are managed appropriately</p>	<p>Your legal adviser</p> <p>The Information Commissioner’s Office</p> <p>The Legal Ombudsman Service</p> <p>The Solicitors Regulation Authority</p> <p>Lender/product provider</p> <p>Our professional indemnity insurers and insurance adviser</p> <p>Our external solicitors or counsel</p> <p>External consultants/advisers to assist in dealing with complaints</p>

		<p>Our Affiliate Company</p> <p>External Auditing and accreditation organisations such as Lexcel / Legal Aid</p>
<p>To undertake investigations into allegations of misconduct and/or criminal offences</p> <p>To notify the relevant authorities of any suspicious activity following an investigation undertaken by us into or any information received relating to any allegations of misconduct and/or criminal offences</p>	<p>Compliance with a legal obligation.</p> <p>We also consider that we have a legitimate interest in protecting our organisation, other parties and the financial services industry more widely in detecting, preventing and investigating financial crime and/or misconduct</p>	<p>Your legal adviser</p> <p>The Information Commissioner's Office</p> <p>The Legal Ombudsman Service</p> <p>The Solicitors Regulation Authority</p> <p>Lender/product provider</p> <p>Our professional indemnity insurers and insurance adviser</p> <p>Our external solicitors or counsel</p> <p>External consultants/advisers to assist in dealing with complaints</p> <p>Our Affiliate Company</p> <p>External Auditing and accreditation organisations such as Lexcel / Legal Aid</p> <p>National Crime Agency (NCA)</p> <p>Police</p> <p>HMRC</p>
<p>To provide you with a legal service and consider any additional legal services or services considered</p>	<p>Performance of a Contract – with you – to provide you with a</p>	<p>Your legal adviser</p>

<p>appropriate to be offered by our affiliate company</p>	<p>relevant legal service in relation to your position</p>	<p>The Information Commissioner's Office</p> <p>The Legal Ombudsman Service</p> <p>The Solicitors Regulation Authority</p> <p>Lender/product provider</p> <p>Our professional indemnity insurers and insurance adviser</p> <p>Our external solicitors or counsel</p> <p>External consultants/advisers to assist in dealing with complaints</p> <p>Our Affiliate Company</p> <p>External Auditing and accreditation organisations such as Lexcel / Legal Aid</p>
<p>To undertake anti-money laundering, identification and verification checks, including assessment of your sanction check information (any personal data obtained for the purposes of meeting with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 will only be processed for the purposes of preventing money laundering or terrorist financing, unless the use of the data is permitted or required by or under another enactment other than those Regulations, or we have</p>	<p>Compliance with a legal obligation</p>	<p>External supplier(s) to conduct anti-money laundering, identification and verification checks on our behalf</p> <p>Lender/product provider</p>

another lawful basis for processing it)		
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Marketing

We and our affiliate company may also wish to provide you with information about special features of our website or any other service or products we think may be of interest to you. If you would rather not receive this information, please send a blank email message to optoutmarketing@pepperells.com. If you agree to us providing you with marketing information, you can always opt out at a later date.

We may also send emails to you about the services that we offer. . If you would rather not receive this information, please send a blank email message to optoutservices@pepperells.com. If you agree to us providing you with marketing information, you can always opt out at a later date.

We may also provide your information to carefully selected third parties whose products or services we believe may be of interest or of relevance to you. If you do not wish us to disclose your information in this way, please send an email to optoutthirdparty@pepperells.com.

Our use of cookies and other information-gathering technologies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. The information is used to track visitor use of the website and to compile statistical reports on website activity. For further information about cookies visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function if you remove cookies from your browser.

How we protect your information

We have put in place security procedures and technical and organisational measures to safeguard your personal information including, (but not limited to) firewalls, browser certification technology, encryption, limited access, use of passwords, subscription to anti-virus and anti-spam software, etc. as appropriate.

We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

Access to your information and updating and correcting your information

You have the right to access your personal data, correct/erase your personal data, restrict how we use your personal data, request a copy of your information, object to how we use your personal data, ask for a transfer of your personal data to another law firm, and find out more about the information that we hold about you under the General Data Protection Regulation. If you would like a copy of some or all of your personal information, please write to: Stephen Orridge, the Data Protection Officer at 100 Alfred Gelder Street, Kingston-upon-Hull, HU1 2AE. We may charge a reasonable fee for this service. If at any time you want to withdraw your consent to our use of your Personal Data, please write to the at the above address. You must ensure any correspondence to the Data Protection Officer has your full contact details, matter reference number, or other relevant information, to allow us to process your request in a timely manner. We accept no liability for a delay caused by insufficient information being provided to us in the first instance.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to Pepperells Limited changes, for example if you change your email address, name or payment details, please let us know the correct details by sending an email to info@pepperells.com or by sending a letter to Stephen Orridge, the Data Protection Officer at 100 Alfred Gelder Street, Kingston-upon-Hull, HU1 2AE. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

Sale of business

If Pepperells Limited's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

Your consent

By submitting your personal information you consent to the use of that information as set out in this policy.

Changes to privacy policy

We keep our privacy policy under regular review. If we change our privacy policy we will post the changes on this page, and place notices on other pages of the website, so that you may be

aware of the information we collect and how we use it at all times. This privacy policy was last updated on 18th November 2020.

How to contact Pepperells Limited

We welcome your views about our website and our privacy policy. If you would like to contact us with any queries or comments please send an email to info@pepperells.com or send a letter to the Stephen Orridge, Data Protection Officer at 100 Alfred Gelder Street, Kingston-upon-Hull, HU1 2AE.

Our Supervisory Authority

If you are not happy with the way we handle your information, you have the right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk)

Links to other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their privacy policies.