

We are committed to protecting and respecting your privacy and the security of your personal information.

**Should you have cause for concern or general enquiry please contact us.**

Contact Details:

Data Protection Manager at Norfolk FWAG, Honingham Thorpe, Colton, Norwich, NR9 5BZ.

admin@norfolkfwag.co.uk

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be used by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation, the data controller is Norfolk FWAG, Honingham Thorpe, Colton, Norwich, NR9 5BZ.

### **INFORMATION WE COLLECT FROM YOU**

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us during our engagement by corresponding with us during meetings, by phone, e-mail or otherwise. The information you give us may include your name, address, e-mail address and phone number, gender, financial and other personal details relating to your affairs and circumstances.
- **Information we receive from other sources.** We are working closely with third parties (including, for example other professional advisers, such as Natural England and the RPA). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

### **HOW WE MAKE USE OF THE INFORMATION**

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

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third parties) provided your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.
- Where it is needed to verify your identity, for example for Anti-Money Laundering purposes.

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. The situations in which we will process your personal information are listed below:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from the contract entered into between you and us and to provide you with the services that you have instructed us to perform;
  - to provide you with information about other services we offer that are similar to those that you have already received or enquired about;
  - to provide you with information about services we feel may interest you:
    - if you are an existing client, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which we have previously provided (soft opt-in);
    - if you are a new client, we will contact you by electronic means only if you have explicitly consented to this. If you are happy for us to use your data in this way for marketing purposes, please tick the relevant box [situated on the form on which we collect your data]); and
    - where we permit selected third parties to use your data, they will contact you by electronic means only if you have explicitly consented to this. If you are happy for us to pass your details on to third parties for marketing purposes, please tick the relevant box [situated on the form on which we collect your data]); and
  - to notify you about changes to our services; and
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of marketing we serve to you and others, and to deliver relevant marketing to you; and
- to make suggestions and recommendations to you and others about services that may interest you or them.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

- **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you and deliver our services, or we may be prevented from complying with our legal obligations.

- **Change of purpose**

We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **SHARING YOUR INFORMATION WITH THIRD PARTIES**

We may have to share your data with third parties, including other professional advisers, third-party service providers and other related entities. We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

You agree that we have the right to share your personal information with:

- selected third parties including:

- professional advisers, suppliers and sub-contractors, but only for the necessary performance of any contract we enter into with you and provided that we have a contract in place that requires your information to be kept securely and to only be used in accordance with applicable data protection law;

The following third-party service providers process personal information about you for the following purposes:

| Third Party Supplier | Processing Details |
|----------------------|--------------------|
| Mail Chimp           | Electronic Mailing |

All our third-party service providers and other related entities are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will also disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or terms and conditions and other agreements, or to protect the rights, property, or safety of Norfolk FWAG, our clients, or others.

### **WHERE WE STORE YOUR PERSONAL DATA**

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **TRANSFERRING INFORMATION OUTSIDE THE EEA**

We will not transfer the personal information we collect about you outside the EEA.

### **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third

parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **HOW LONG WE RETAIN YOUR PERSONAL DATA**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. In order to comply with law and to ensure we have the necessary information required in order to resolve future issues that might arise, we retain all personal data for a period of 16 years from collection. 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.

### **YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

- **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes at any point in the future.

- **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. 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 to processing of 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.
- Request the restriction of processing of your personal information. 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.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Privacy Manager in writing.

- **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

- **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

- **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Privacy Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your

information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Our site may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back to see any updates or changes to our privacy policy.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [advice@norfolkfwag.co.uk](mailto:advice@norfolkfwag.co.uk).

You can obtain further information about data protection laws by visiting the Information Commissioner's Office website at [www.ico.org.uk](http://www.ico.org.uk).