# Public Privacy Statement

Treethorpe are committed to protecting individual privacy rights. We hold ourselves to the highest ethical standards and adhere to all legal requirements. We value the trust placed in us by our clients, colleagues and suppliers and strive to maintain that trust by building privacy protection into everything we do.

This privacy statement applies to the collection and processing of 'personal information'. This is defined as information about an identifiable individual (you) that Treethorpe Limited (Treethorpe, we or us) collects in the course of our business activities. We gather this information from many sources, including public records, suppliers of consented data, or information supplied directly to us by either yourself, another natural person or another data controller.
This statement does not apply to the collection and processing of information we collect about users of our website. For more information about privacy in the context of our website, please visit the dedicated Privacy Policy on the website.

It also does not apply to the collection and processing of personal information about our employees or contractors. For more information about privacy in the context of doing work for Treethorpe, please contact us.

This privacy statement may be updated without notice to you; though we will advise you of any major changes.

## What data do we collect about you and why?

We may start collecting basic personal information (as defined below) about you as soon as you are identified as a prospective client or person of interest in any given case. This may be collected directly from you or indirectly using other sources.

We may start collecting any additional information from you once you agree to our terms and conditions and engage our services. Once you are an engaged client, we may request additional personal information from you to enable us to verify your identity and/or to transfer monies or assets due to you. However, we will only collect information if there is a clear reason and requirement for us to do so and will only acquire and store this information with your explicit consent.

## How and why do we collect personal information?

Our work requires that we instigate research to identify and locate individuals who have an entitlement to assets/ inheritances of which they are presently unaware, or otherwise not currently benefitting from.

These legitimate interests necessitate that we collect and store some basic personal information ahead of any formal engagement, the purpose of which is to make a positive trace and to supply valuable information that is intended to enrich or benefit our clients directly.

In certain circumstances, we may have collected your personal information in the knowledge or understanding that, while you are not beneficially entitled — i.e. not a prospective client — you may well be able to provide some assistance in our investigations. For those individuals that do provide us with such valuable information or insight, we will only store personal information for as long as is absolutely necessary.

## Who bears the responsibilities for data protection?

When we provide our service to you as our client, we are generally responsible for the following aspects of the collection and processing of personal information:

- carrying out the services requested by you in accordance with our agreement and in line with your instructions;
- storing and protecting personal information in our custody in accordance with our agreement with you and your instructions;
- ensuring that personal information is collected for proper purposes and deleted once those purposes have been fulfilled; and
- compliance with any legal obligation we may have as a data controller, data processor, custodian, service provider or similar under applicable law.

Generally speaking, you will be responsible for the following aspects of the collection and processing of personal information:

- determining what personal or sensitive information we collect and how we use it;
- if appropriate, you are notified of, or provide consent for, the collection and processing of your personal information in accordance with the applicable law; and
- complying with any legal obligation you may have as the entity that controls or owns the personal data.

## What types of personal information do we collect?

The types of basic information we will collect may include the following:

- Your name
- Your date of birth
- Job title and company name
- Contact information including physical addresses, telephone numbers (including mobiles) and email addresses
- Your familial relationships

The types of additional personal information we may request from you (if you are a client) may include the following:

- Your National Insurance number (or National Client Identifier)
- Your nationality
- Your photocard ID or Passport
- Evidence of your home address

We will not reuse personal information for a new purpose other than the original one(s) for which it was collected, unless:

- the new use is compatible with the original one, meaning you should reasonably expect it;
- have notified you of the new use and given you an opportunity to object to it; or
- the new use is otherwise permitted or required by law.

## When, why and how do we communicate personal information outside of treethorpe?

### TO COMPLETE SERVICES

When we provide our services to you, we may transmit personal information back and forth with other registered data controllers. This is done through our secure web platform, phone, mail, email and occasionally by fax. When we provide services to you it is done so in accordance with your instructions.

### ENGAGING SERVICE PROVIDERS

Most of our work is carried out by our employees or authorised personnel who access personal information directly from our secure systems and whose activities are under our direct control. We use third party service providers for certain specialised tasks, these include: storage of data, accountancy, legal services, information technology support and some services we perform as agent or intermediary on behalf our clients. All service providers will be registered Data Controllers or otherwise compliant with current data protection legislation.

It would be impractical to list all the service providers, however, should you wish to understand which service providers may receive your personal information, please contact us.

### WHEN REQUIRED BY LAW

In exceptional circumstances, we may be asked to communicate personal information to law enforcement agencies, courts or public bodies in any jurisdiction where we are subject to the law, regardless of where personal information is stored. If we receive a production order, subpoena or other enforceable demand, we will comply as required by law.

If we receive a request to provide information voluntarily, we will consider your interests, our business interests, the interests of our clients, public safety implications and our legal obligations prior to deciding whether to communicate personal information. In any case where the information in question was collected from or on behalf of a client, we will consult with you before proceeding unless prohibited by law.

We may proactively communicate personal information to law enforcement or other third parties if necessary to investigate or report a violation of the law or a contractual arrangement, or if otherwise appropriate and permitted by law.

## Who will we share your personal information with and why?

There will be limited circumstances where we will share your personal information with third party service providers in the normal course of pursuing our legitimate interests and/or services under the contract. Where the information is to be shared for a new purpose, we shall seek your permission prior to sharing any personal information.

We do not sell or disclose your personal information to governments, marketing or advertising services, other clients or anyone else (except as may be required by law).

## Where is personal information stored?

Your personal information is stored in the United Kingdom and Ireland.

## Do we transfer personal information between countries?

In our normal course of business, we do not transfer personal information between countries. However, our work can involve employing researchers or legal professionals outside of the United Kingdom in performance of our contractual obligations, or in pursuit of our legitimate interests.

All such service providers will be either: registered Data Controllers within the European Union (EU) or European Economic Area (EEA), within a recognised adequate country or territory outside the EEA (as determined by the EU Commission), or otherwise compliant and compatible with current UK data protection legislation.

## How do we ensure your personal information is accurate?

Much of the personal information we collect comes directly from you, in which case you are in control of its accuracy. Where we have gathered information from another source we independently verify that the information is accurate.

Information that is found to be inaccurate, either through our own audits or following your request for correction, is updated immediately.

## Do we engage in automated decision-making or profiling using personal information?

We do not engage in automated decision-making. Any decisions made about you, your identity, or your eligibility to become a client require human intervention and analysis. We do not attempt to analyse or predict your behaviour, preferences, interests, health or other personal characteristics.

If you have engaged our services, to assist with the verification of your identity Treethorpe may undertake a consented 'soft' search with a credit reference agency — on a strictly 'opt-in' basis. To do

so, the credit referencing agency may check the details supplied against any particulars on any database (public or otherwise) to which they have access. They may also use your details in the future to assist other companies for verification purposes and a record of the search will be retained.

The results of any such search will require human intervention and analysis; and will not preclude you being able to supply your identification in another acceptable format.

## Do we conduct research using your personal information?

We do not use your information to conduct any market research. We maintain some limited historical statistical data in anonymised, aggregate format for research and analysis.

All research conducted using any personal information has a strictly limited scope in the performance of our services and legal obligations. The information used is to compile a Family Tree and to determine the relationships between natural persons who have an interest and/or legal entitlement in the subject of the case, or services being rendered. We do not collect any more information than is required in performance of these duties.

## How long do we keep personal information?

Our retention policy is to retain personal information for as long as you are a client and/or the case is ongoing. Once the case is concluded, we store the information for one calendar year in physical format and a further maximum of six years in secure digital archives, after which it is permanently deleted.

We also run regular quality assurance checks of our systems and filing to ensure that references to personal information are anonymised as a matter of course.

If we have contacted you in error, or you have since been found not to have a beneficial entitlement in the case, we will remove your information from our system as soon as possible.

The exceptions to this policy are instances are where we are required to retain personal information for specified periods to comply with our legal obligations.

For information on how long your personal information may be retained, please contact us.

## How do we protect personal information?

We have advanced security measures in place to protect and secure your personal information, such as internal and external firewalls, monitoring and alert systems to prevent and detect intrusion attempts, encryption of data both in transit and at rest.

Our servers are located within a securely managed infrastructure and undergo multiple reviews by independent auditors. Our employees access data through secure desktop interfaces and our online interfaces are encrypted, password protected and monitored.

We employ equally rigorous physical security policies to prevent physical access to our premises. Our servers and offices, including personal information stored in hard copy form, are kept in access-controlled and monitored environments.

All our employees have been carefully screened and undergone security and privacy awareness training, with regular refresher training. We restrict access to your information to individuals who need it to perform their work functions. Our staff may have regular access to your information and may access it occasionally to manage our relationship with you and fulfil our legal obligations.

We also enter into contractual agreements with service providers with whom we may need to share your personal information, which require them to protect your personal information to the same level as we do, and allow us to audit their compliance with those obligations.

## How can you choose how and whether we collect and use your personal information?

Whenever our basis for collecting and using personal information is by your consent, you can withdraw or modify your consent for future collection or use of your personal information at any time.

If we use your personal information for sales or marketing purposes, you can ask us to stop at any time and we will do so.

## How can you access or correct your personal information, request that it be deleted, or ask that it be transferred to another organisation?

At any time, you can request access to your personal information, request that any inaccuracies be corrected, and request that comments or explanations be added to records about you.

You can also ask about:

- Whether and why we have your personal information
- How we got your personal information
- What we have done with your personal information
- To whom we have communicated your personal information
- Where your personal information has been stored, processed or transferred
- How long we will retain your personal information, or how that retention period will be determined; and
- The safeguards in place to protect your information when it is transferred to third parties or third countries.

Finally, you can ask us not to collect or use your personal information for certain purposes, you can ask us to delete your personal information, or you can ask us to provide your information to a third party.

To protect your privacy, for Treethorpe to service any such requests we will require satisfactory evidence of your identity before we release or transfer any personal information. We undertake to respond within 30 days of receiving validated formal identification.

Depending on which laws apply to your personal information, we may only be able to do some of these things for you. If you request one of these things and we refuse to do it, we will explain your legal rights, the reason for our refusal and any recourse that you may have.

## How can you make a complaint about how we have handled your personal information or responded to a request to exercise your rights?

We commit to investigating and resolving complaints about our collection or use of your personal information. To make a complaint, please contact us. A copy of our complaints procedure is available on our website or ask us for a copy.

## Contact us

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Information Commissioner's Office Registration Number: Z119381X