

# My Digital Legacy

## Privacy Policy

### Privacy Policy

Sussex Smart Solutions Limited, trading as My Digital Legacy (“My Digital Legacy”) is committed to protecting your personal information.

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed; we will contact you to let you know.

We only use Cookies to facilitate the correct functioning of our website.  
This version of our Privacy Policy was last updated on 2nd March 2021.

### How to contact us

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact:

The Data Protection Officer  
My Digital Legacy,  
57 North St,  
Chichester  
PO19 1NB

Email: [info@mydigitallegacy.org](mailto:info@mydigitallegacy.org)

### Information we collect and use

Information about you that we collect and use includes:

- Information about who you are e.g. your name and contact details
- Information connected to your product or service with us e.g. your subscription details
- Information about your contact with us e.g. meetings, phone calls, emails / letters
- Information that is automatically collected e.g. via cookies when you visit one of our websites

- Information to allow you to access our online services e.g. user name, email address.

Where we collect and use sensitive personal information, this information will only be collected and used where it's needed to provide the product or service you have requested or to comply with our legal obligations, and where we have also obtained your explicit consent to process such information.

## Where we collect your information

We may collect your personal information directly from you, from a variety of sources, including:

- An application form for a product or service
- Phone conversations with us
- Emails or letters you send to us
- Registering for one of our events e.g. roadshows
- Participating in research surveys to help us understand you better and improve our products and services
- Our online services such as websites, social media and mobile device applications ('Apps')

We may also collect personal information on you from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address) or to give better contact information if we are unable to contact you directly.

## Why we collect and use your information

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only if we are able to satisfy one of the lawful processing conditions set out in the data protection laws.

This will be the case where:

- You have given us your permission (consent) to use your information.
- It's necessary to provide the product or service you have requested
- It's necessary for us to meet our legal or regulatory obligations e.g. to tell you about changes to Terms and Conditions
- It's in the legitimate interests of My Digital Legacy i.e.
  - To deliver appropriate information and guidance so you are aware of the options that will help you get the best outcome from your service

- Where we need to process your information to better understand you and your needs so we can send you more relevant communications about the products you have with us
  - To develop new products and services
  - To conduct research and collate management information to improve the products and services we offer
- It's in the legitimate interests of a third party e.g. your Executor.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products or services.

### **Who we may share your information with**

We will not share your information with third parties unless explicitly authorised.

### **Where your information is processed**

The majority of your information is processed in the UK.

However, some of your information may be processed by us or the third parties we work with in the European Economic Area (EEA), and countries such as India.

Where your information is being processed outside of the UK, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK data privacy laws e.g. we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

### **How we protect your information**

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations. An example of this is that Internal and external audit and specialist third party consultants conduct regular, independent assurance and benchmarking exercises across our business to ascertain the effectiveness of our security control environment and our security strategy.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

### **How long we keep your information**

To provide your product and meet our legal and regulatory obligations, we keep your personal information and copies of records we create (e.g. calls with us) while you are a customer of ours.

Even when you no longer have a relationship with us, we are required to keep information for different legal and regulatory reasons. The length of time will vary and we regularly review our retention periods to make sure they comply with all laws and regulations.

### **Your rights**

You have a number of rights under Data protection laws which may be exercised in certain circumstances.

These are:

### **Right to be informed about how and why we are processing your personal information**

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with - we do this in our Privacy Policy and privacy notices.

### **Right of access to personal information relating to you**

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR).

### **Right to request rectification of inaccurate or incomplete personal information**

If your personal information is inaccurate or incomplete, you can request that it is corrected.

### **Right to request erasure of your personal information**

You can ask for your information to be deleted or removed if there is not a compelling reason for My Digital Legacy to continue to have it.

## **Right to restrict processing of your personal information**

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information - but only to ensure we don't use it in the future for those reasons you have restricted.

## **Right to data portability**

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example, if you were moving your pension to another pension provider.

## **Right to object to processing of your personal information**

You can object to My Digital Legacy processing your personal information where: it's based on our legitimate interests (including profiling); for direct marketing (including profiling); and if we were using it for scientific/historical research and statistics.

## **Right to not be subject to automated decision making including profiling**

You have the right to ask My Digital Legacy to:

- give you information about its processing of your personal information
- request human intervention or challenge a decision where processing is done solely by automated processes
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should.

More information can be found on your rights here <https://ico.org.uk/for-the-public/>

If you want to talk to us about any of the individual rights, please contact us at the Data Protection Officer's address.

## **How to make a complaint**

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please let us know immediately and we will do our utmost to make things right

by contacting our Data Protection Officer at the address previously provided in the How to Contact Us section.

While we hope that we can resolve any complaints for you, you do have the option complain to the ICO (whether or not you have exhausted our complaints procedure). Their contact details are as follows:

Website: <https://ico.org.uk/> Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: [0303 123 1113](tel:03031231113) (local rate) or [01625 545 745](tel:01625545745) if you prefer to use a national rate number