Client Privacy Policy (25th July 2019)

Our services

Risq Ventures Limited provides an information Service to Customers who manage financial affairs of another Person.

We take data privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data. It also explains rights in relation to personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use personal data, we are regulated under the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) which applies across the European Union (including in the United Kingdom). We are responsible as 'controller' of that personal data for the purposes of the GDPR under the Data Protection Act 2018, the United Kingdom's implementation of GDPR.

Our use of personal data is subject to your instructions, GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Regulated services

Risq Ventures Ltd is an Appointed Representative (AR) of Momentum Broker Solutions Ltd (Momentum) for insurance mediation. Momentum is the principal firm authorised and regulated by the Financial Conduct Authority (FCA). An AR is a firm who runs regulated activities and acts as an agent for a principal firm directly authorised by the FCA.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our, Risq	Estatesearch is a trading name of Risq Ventures Limited Risq Ventures Ltd, a limited company registered in England under 09417760, whose registered address is 5 Chancery Lane, London WC2A 1LG.
You, your	the Client
Data Controller	Risq Ventures Ltd is registered as a Data Controller with the Information Commissioner's Office (ICO) (Registration Number: ZA104965) https://ico.org.uk/ESDWebPages/Entry/ZA104965

Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic and biometric data, Data concerning health, sex life or sexual orientation.
Our Site	The websites www.estateSearch.co.uk, https://app.estatesearch.co.uk/users/sign_in or https://uat.estatesearch.co.uk/users/sign_in
HubSpot	Third party supplier of a Customer Relationship Management system used by us
Squarespace	Third party supplier of our brochure website
Cookie	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. These are stored on your computer either temporarily for that session only or permanently on the hard disk (persistent cookie). Cookies provide a way for Our Site to recognize you and keep track of your preferences.
User Account	an account required to access and/or use certain areas and features of Our Site.
Credit Reference Agencies (CRAs)	There are three main Credit Reference Agencies in the UK who deal with people's personal data. Each is regulated by the FCA and authorised to conduct business as a credit reference agency. Experian Limited Post: Experian, PO BOX 9000, Nottingham, NG80 7WF Web Address: https://www.experian.co.uk/consumer/contact-us/index.html Phone: 0344 481 0800 or 0800 013 8888 Equifax Limited Post: Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS. Web Address: https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html Phone: 0333 321 4043 or 0800 014 2955 Callcredit Limited part of the TransUnion Information Group (formerly Callcredit Information Group) Post: Callcredit Information Group, One Park Lane, Leeds, West Yorkshire LS3 1EP. Web Address: https://www.transunion.co.uk/consumer-solutions/contact-us Phone: 0330 024 7574 **Credit Reference Agency Information Notice (CRAIN)** This describes how the three main CRAs each use and share personal data (also called 'bureau data') that is part of or derived from or used in credit activity. • Experian: https://www.experian.co.uk/crain/index.html

Service	The purchase and provision of any report or reports through Our Site or other means for the placing of an Instruction. Further details of services can be found at https://www.estatesearch.co.uk/services
Customer	The company which has entered into the Conditions with us, to act as agent of the Client in the procurement of the Services.
Conditions	Our terms & conditions together with the Search Request Form, as amended by Risq from time to time. https://www.estatesearch.co.uk/s/Terms-Conditions.pdf
Search Request Form	The form completed by the Customer, providing details of the Client and Person, together with any additional information required by Risq to fulfil the Instruction.
Client	The Appointed Representative of the Person, for whom the Customer is acting as agent in the procurement of the Services.
Appointed Representative	The Client acting in a professional capacity either as or on behalf of a) an executor or personal representative for probate or estate administration for the Person; or b) an attorney or deputy authorised by the Court of Protection and regulated by the Office of the Public Guardian for the Person.
Notifier	The Appointed Representative with a Legal obligation and a Legitimate interest to manage a Person's financial affairs.
Person	Either a deceased individual or a living individual lacking mental capacity for whose estate the Client is acting and for whom the Customer has procured the Service.

Personal data we collect

The table below sets out the personal data we may collect in the course of providing services to you.

In respect of a Client, Appointed Representative and Notifier	**In respect of a Person** *(we will only store and process personal data where we have evidence of legitimate authority to provide information)*
Information to enable us to create and manage your user account, e.g. • Full name • Address • Email Address • Telephone number Employment Details • Company name • Role • Qualifications Information to enable us and third-parties (e.g. Banks or building societies, pension administrators, other organisations receiving legal notices) to check and verify your identity, e.g., • Date of birth • Address • Passport details • National Insurance No. • Driving License No. • Gender • Copies of Identity Documents • Copies of Address Verification Documents	Information to enable us to provide our Service, e.g., • Full name • Previous or Alias names • Address History • Date of Death (Estate Administration matters) • Date of Appointment (Mental Capacity matters) • National Insurance No. • Employer & Previous Employers Supporting Information relating to the matter, e.g., copies of documents required as evidence of authority to access information requested • Letter of engagement • Will • Grant of Probate • Death Certificate • Coroners Certificate • Court of Protection Order • Lasting Power of Attorney Genealogy (family history) and Financial connections • spouse/partner • dependants • parents • siblings • other family members • other third parties with financial connections Financial records • Assets • Benefits • Pension • Liabilities • Bankruptcies, IVA's, CCJ's.

This personal data is required to enable us to provide our service to you. If you do not provide the personal data when we ask for it in relation to you or the Person, it may delay or prevent us from providing services to you.

How your personal data is collected

We collect information about you and the Person directly from you through Our Site via

- Search Request Form
- Cookies

In the provision of our Service, we may also collect information from:

- Publicly accessible sources e.g. Companies House or HM Land Registry;
- Third parties e.g.
  - Identity, sanctions and document validation screening providers;
  - Credit Reference Agencies (CRAs);
  - Banks or building societies, pension administrators, other organisations;
  - Consultants and other professionals we may engage in relation to your matter;

Cookies

We use cookies and similar technologies ("cookies") on this website for various purposes. A cookie is a data file that a website sends to your browser, which then stores it on the device that you are using to browse the website.

How Our Sites use Cookies

The main cookies used on Our Sites are as follows:

Cookie Type	**Details**
Analytics	These cookies help us to improve Our Sites over time, by giving us insights into how the various sections of the website are used and how users interact with the website. The information collected is anonymous and statistical.
Affiliate Lead Tracking	We use a range of third parties to promote Our Sites. We use these cookies so that, when you reach Our Site because of one of those third parties, we can identify the third party and therefore meet our contractual commitments to that third party.
Session	These are cookies that are designed to ensure that your visit to Our Site is as smooth as possible, they expire after 30mins of inactivity, or when the session is closed. Their main uses are: • Allowing us to identify your device as you use the website, so that you are not treated as a new visitor each time you go to another part of the website; • Ensure that the servers that we use to power the website each serve an equal number of users, to help make everyone's browsing as swift and responsible as possible; • Allowing us to restrict or grant access to the website from certain IP Addresses • Understanding your browser's capabilities.

How to reject or delete Cookies

Most web browsers automatically accept cookies. However, you do not have to accept cookies and you can, should you choose to at any time, reject or block the use of cookies.

You can delete all cookies currently stored on your device once you have finished using our Service. You can find out how to do this for your particular browser by clicking "help" on your browser's menu, or by visiting: www.allaboutcookies.org.

Please be aware however that if you chose to block cookies you may not be able to access certain features of this Our Sites.

For help locating cookies on your device, visit your *browser*'s documentation:

- Chrome
- Firefox
- Safari
- Internet Explorer

For information on how to reject or delete cookies on the browser of your mobile device you may need to refer to your device's manual.

Third Party Cookies

We may allow third party organisations to set cookies using this website in order to deliver services. If you would like more information about the cookies used by these third parties, as well as details on how to opt-out, please see the table below.

Cookie Name	What the cookie is used for
__hs_opt_out (HubSpot)	This cookie is used to remember not to ask you to accept cookies again. This cookie is set when you give are given the choice to opt out of cookies. *(Expires: 13 months)*
__hs_do_not_track (HubSpot)	This cookie can be set to prevent the tracking code from sending any information to HubSpot. It still allows anonymised information to be sent to HubSpot. *(Expires: 13 months)*
hs-messages-is-open (HubSpot)	This cookie is used to determine and save whether the chat widget is open for future visits. It resets to re-close the widget after 30 minutes of inactivity. (*Expires: 30 minutes*)
hs-messages-hide-welcome-message (HubSpot)	This cookie is used to prevent the welcome message from appearing again for one day after it is dismissed. (*Expires: 1 day*)
__hstc (HubSpot)	The main cookie for tracking your visits. It contains the domain, utk, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session). *(Expires: 13 months)*

hubspotutk (HubSpot)	This cookie is used to keep track of your identity. This cookie is passed to HubSpot on form submission and used when deduplicating contacts. *(Expires: 13 months)*
__hssrc (HubSpot)	Whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser. If this cookie does not exist when HubSpot manages cookies, it is considered a new session. *(Expires: end of session)*
messagesUtk (HubSpot)	This cookie is used to recognise if you chat with us via the messages tool. If you leave the site before you have been added as a contact, you will have this cookie associated with your browser. If we chat with you and you later return to our site in the same cookied browser, the messages tool will load your conversation history. *(Expires: 13 months)*
squarespace-popup-overlay	Prevents the Promotional Pop-Up from displaying if you dismiss it *(Persistent)*
squarespace-announcement-bar	Prevents the Announcement Bar from displaying if you dismiss it *(Persistent)*
Crumb	Prevents cross-site request forgery (CSRF). CSRF is an attack vector that tricks a *browser* into taking unwanted action in an application when you logged in. *(Session)*
RecentRedirect	Prevents *redirect* loops if a site has custom URL redirects. *(Expires: 30 minutes)*

Tracking technologies that our marketing emails use

We may use performance tracking technology within our emails to improve our future interactions with you. This means we are able to capture information including (but not limited to) the time and date you open our e-mails and the type of device used to open the email.

We use this information primarily to understand whether our e-mails are opened and what links are clicked on by our customers. We then use this information to improve the emails and other communications (including Post and Fax) that we send or display to you, and the services that we provide.

How and why we use personal data

Under data protection law, we can only use personal data if we have a proper reason for doing so, e.g.

- to comply with our legal and regulatory obligations;
- for the provision of our Service to you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so. It does not apply to special category personal data, which we will only process with your explicit consent.

What we use personal data for	**Our reasons**
To provide our Service to you in relation to a Person	Legitimate interest for the performance of our Service or to take steps at your request before entering into a contract
Conducting checks to verify your identity including Screening for financial and other sanctions or embargoes, other processing necessary to comply with professional, legal and regulatory obligations that apply to our business.	To comply with our legal and regulatory obligations
Providing contact details of the professional **(Notifier)** who is legally authorised to act on behalf of the Person Including: • Certified ID of the Notifier **(to verify identity and address);** and • Copy of Death Certificate or Court of Protection Order **(to verify the Person's capacity)**	To enable third-parties to comply with their legal and regulatory obligations. To prevent and detect criminal activity that could be damaging for third-parties, us, you and or the Person
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures, so we can deliver the best service to you

Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	To comply with our legal and regulatory obligations for our legitimate interests or those of a third party, i.e., to protect our intellectual property and other commercially valuable information
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, work type or other efficiency measures	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	To comply with our legal and regulatory obligations for our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you
Updating and enhancing customer records	To comply with our legal and regulatory obligations for the performance of our Service or to take steps at your request before entering into a contract, or for our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations for our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to existing and former customers	For our legitimate interests or those of a third party, i.e., to promote our business to existing and former clients
External audits and quality checks, e.g. • Momentum Broker Solutions Ltd which is authorised and regulated by the Financial Conduct Authority. • Credit Reference Agencies • Office of Public Guardian (OPG) • Financial audit of our company accounts	For our legitimate interests or a those of a third party, i.e. to comply with our legal and regulatory obligations

Promotional communications

We will always treat personal data with the utmost respect and never sell it to other organisations outside Risq Ventures Limited for marketing purposes.

We may use personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services.

You have the right to opt out of receiving promotional communications at any time by contacting us, see below: '**How to contact us**' or using the 'unsubscribe' link in any emails or 'STOP' number in texts.

We may ask you to confirm or update your marketing preferences, if there are changes in the law, regulation, or the structure of our business.

Who we share personal data with

We routinely share personal data with:

- professional advisers who we instruct on your behalf
- third party service providers where necessary to enable us to provide our service to you. A full list of third parties reference to their Terms & Conditions are available at www.estatesearch.co.uk/third-party-terms
- Banks or building societies, pension administrators, other organisations
- our group companies;
- our insurers and insurance brokers;
- external compliance auditors, e.g.,
  - Audits Office of Public Guardian (OPG)
  - Audits by third party service providers
  - Audit of our company accounts
- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. typing services, marketing agencies, document collation or analysis suppliers.

We only allow our service providers to handle your personal data if we are satisfied, they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Where personal data is held

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see 'Who we share personal data with').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: 'Transferring personal data out of the EEA.'

Our data is held securely by Amazon Web Services (AWS) within the EU who meet a broad range of international and industry specific standards including ISO:27001 and are trusted by some of the largest organisations in the world including governments and financial institutions. All data is encrypted while at rest and in transit and all websites/API endpoints are secured by SSL (https).
For further detailed please see
https://d1.awsstatic.com/whitepapers/Security/AWS_Security_Whitepaper.pdf

Keeping personal data secure

We maintain security policies and protocols to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to personal data to those who have a genuine business need to access it. Those processing personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

All Risq staff are Disclosure and Barring Service (DBS) checked. Our system architecture means all staff have limited access to databases containing personal data. User access is only granted to companies and individuals who are first vetted and approved by dual authentication.

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

How long personal data will be kept

We will keep personal data after we have finished providing services to our Customer. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by the Customer;
- to show that we treated Customers fairly;
- to keep records required by law.

We may retain data and information that the Customer has provided in respect of the Client and Person along with the content of the Report generated by the service for a period of up to twelve years after the Instruction date.

We will not retain data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.

When it is no longer necessary to retain personal data, we will delete or anonymise it where required to ensure systems and services remain operational.

Transferring personal data out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA), e.g.,

- with our service providers located outside the EEA;

- if our Customer or You are based outside the EEA;
- where there is an international dimension to the matter in which we are providing the service.

These transfers are subject to special rules under European and UK data protection law.

The following countries to which we may transfer personal data have been assessed by the European Commission as providing an adequate level of protection for personal data:

- Andorra,
- Argentina,
- Canada (commercial organisations),
- Faroe Islands,
- Guernsey,
- Israel,
- Isle of Man,
- Jersey,
- New Zealand,
- Switzerland,
- Uruguay
- United States of America (limited to the Privacy Shield framework)

Except for the countries listed above, these non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal data will be secure. Our standard practice is to use standard data protection contract clauses.

If you would like further information, please contact our Data Protection Officer (see 'How to contact us' below).

Your Rights

All Clients and Persons have the following rights, which can be exercised free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	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
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	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

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please email or write to our Data Protection Officer — see below: '**How to contact us**'. Please make sure your request is clear, containing the following:

Let us have enough information to identify you

- full name,
- address,
- reference number

Let us have proof of your identity and address

- a copy of your driving licence or
- a copy of your passport and
- a recent utility bill or bank statement

Let us know what right you want to exercise and the information to which your request relates.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns.

Changes to this privacy policy

This privacy policy was published on 25th May 2018 and last updated on 25th July 2019. We may change this privacy policy from time to time, when we do, we will inform you by placing a notice on Our Site or by email.

How to contact us

Please contact us by email or telephone if you have any questions about this privacy policy or personal data we hold about you or a Person you're legally authorised to represent.

Our contact details are shown below:

Our contact details	**Our Data Protection Officer's contact details**
Risq Ventures Ltd 5 Chancery Lane, London WC2A 1LG 0330 900 1700 support@estatesearch.co.uk	**Antony Turck** **Data Protection Officer** Risq Ventures Ltd 5 Chancery Lane, London WC2A 1LG 0330 900 1700 support@estatesearch.co.uk