

## Privacy Policy

1. This privacy policy applies to Copthorne LifePlan's website at [www.copthornelp.co.uk](http://www.copthornelp.co.uk). We at Copthorne LifePlan take your privacy seriously. This policy covers the collection, processing and other use of personal data under the Data Protection Act 1998 ("DPA") and the General Data Protection Regulations ("GDPR").
2. For the purpose of the DPA and GDPR we are the data controller and any enquiry regarding the collection or processing of your data should be addressed to Nick Blackford at our address The White House, 53-55 High Street, Egham, Surrey, TW20 9EX.
3. By using the Website you consent to this policy. We are registered with the Information Commissioner's Office for this purpose.

### Information we collect

4. We will collect personal data on this Website only if it is directly provided to us by you the user, e.g. your e-mail address, name, home or work address and telephone number, and therefore has been provided by you with your consent. Normally you will only provide such details if you [wish to sign up for our free e-newsletter or other resources, or] are making a purchase from us.
5. We also use analytical and statistical tools that monitor details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data (but this data will not identify you personally).
6. Your payment information (e.g. credit card details) provided when you make a purchase from our website is not received or stored by us. That information is processed securely and privately by the third party payment processors that we use. Copthorne LifePlan will not have access to that information at any time. We may share your personal data with our payment processors, but only for the purpose of completing the relevant payment transaction. Such payment processors are banned from using your personal data, except to provide these necessary payment services to us, and they are required to maintain the confidentiality of your personal data and payment information.

### Use of your information

7. We may hold and process personal data that you provide to us in accordance with the DPA and GDPR.
8. The information that we collect and store relating to you is primarily used to enable us to provide our services to you, and to meet our contractual commitments to you. In addition, we may use the information for the following purposes:
  - 8.1 To notify you about any changes to our website, such as improvements or service/product changes, that may affect our service;
  - 8.2 If you are an existing customer, we may contact you with information about goods and services similar to those that were the subject of a previous sale to you;
  - 8.3 Where you have consented to receive such information, to provide information on other parties' products or services that we feel may be of interest to you;
  - 8.4 Where you have consented to receive our e-newsletters, from time to time to provide that to you.

### Disclosure of your information

9. We may disclose your information to regulatory bodies to enable us to comply with the law and to assist fraud protection and minimise credit risk.

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10. Where you have consented for us to do so, we may provide your data to selected third parties who may contact you about their goods or services that you may be interested in.
11. If you do not want us to use your data for our [or third parties'] use, you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data, or you can do so by writing to us at the address detailed in clause 2, or sending us an email to [info@copthornelp.co.uk](mailto:info@copthornelp.co.uk) at any time.
12. Please be advised that we do not reveal information about identifiable individuals to our advertisers but we may, on occasion, provide them with aggregate statistical information about our visitors.

### Controlling the use of your data

13. If you have given us consent to use your data for a particular purpose you can revoke or vary that consent at any time. If you do not want us to use your data or want to vary the consent that you have provided you can write to us at the address detailed in clause 2 or email us at [info@copthornelp.co.uk](mailto:info@copthornelp.co.uk) at any time.

### Where we store and transfer your data

14. As part of the services offered to you, for example through our Website, the information you provide to us may be transferred to and stored in countries outside of the European Economic Area (EEA) as we use remote website server hosts to provide the website and some aspects of our service, which may be based outside of the EEA, or use servers based outside of the EEA - this is generally the nature of data stored in "the Cloud". It may also be processed by staff operating outside the EEA who work for one of our suppliers, e.g. our website server host, or work for us when temporarily outside of the EEA.
15. A transfer of your personal data may happen if any of our servers are located in a country outside of the EEA or one of our service providers is located in a country outside of the EEA. If we transfer or store your personal data outside the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the DPA and GDPR. If you use our service while you are outside the EEA, your personal data may be transferred outside the EEA in order to provide you with these services.
16. We do not use or disclose sensitive personal data, such as race, religion, or political affiliations, without your explicit consent.
17. We may disclose your personal data outside of our group: (a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and (b) if Copthorne LifePlan's business is bought by a third party, in which case personal data held by it about its customers will be one of the assets to transfer to the buyer. However any such transfer will only be on terms that the confidentiality of your personal data is protected and that the terms of this privacy policy will continue to be complied with by the recipient.
18. Otherwise, we will process, disclose or share your personal data only if required to do so by law or in the good faith belief that such action is necessary to comply with legal requirements or legal process served on us or the website.
19. You have the right to opt out of our processing your personal data for marketing purposes by contacting us at [info@copthornelp.co.uk](mailto:info@copthornelp.co.uk)

### Security

20. The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you are transmitting it to our site; any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.
21. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential. You should choose a password it is not easy for someone to guess.

## Copthorne LifePlan continued...

### Third party links

22. You might find links to third party websites on our website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

### Use of cookies

23. Our Website uses cookies. We use cookies to gather information about your computer for our services and to provide statistical information regarding the use of our Website. Such information will not identify you personally - it is statistical data about our visitors and their use of our Website. This statistical data does not identify any personal details whatsoever. We may also gather information about your general Internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer, as cookies contain information that is transferred to your computer's hard drive. They help us to improve our Website and the service that we provide to you. All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our Website. Where we work with advertisers on our Website, our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our Website.

### Your rights

24. The DPA and GDPR give you the right to access information held about you by us. Please write to us or contact us by email if you wish to request confirmation of what personal information we hold relating to you. You can write to us at the address detailed in clause 2, above, or by email to [info@copthornelp.co.uk](mailto:info@copthornelp.co.uk). There is no charge for requesting that we provide you with details of the personal data that we hold. We will provide this information within one month of your requesting the data.
25. You have the right to change the permissions that you have given us in relation to how we may use your data. You also have the right to request that we cease using your data or that we delete all personal data records that we hold relating to you. You can exercise these rights at any time by writing to us at the address detailed in clause 2, above, or by email to [info@copthornelp.co.uk](mailto:info@copthornelp.co.uk).

### Changes to this policy

26. We may update these policies to reflect changes to the website and customer feedback. Please regularly review these policies to be informed of how we are protecting your personal data.

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us at The White House, 53-55 High Street, Egham, Surrey, TW20 9EX or [info@copthornelp.co.uk](mailto:info@copthornelp.co.uk)

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This Privacy Policy has been provided by the legal resource [www.legalo.co.uk](http://www.legalo.co.uk).