



Wykeham-Hurford Sheppard & Son Ltd – Client Privacy Policy

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1. INTRODUCTION TO OUR PRIVACY POLICY

In this Privacy Policy the terms, 'we' or 'us' is Wykeham-Hurford Sheppard & Son Ltd. We are a regulated UK law firm.

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. We are the registered data controller for personal information we process. We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number ZA118587.

This policy explains how we collect, use, store and protect your personal information in line with:

- UK GDPR (as amended 2023–2025)
- Data Protection Act 2018
- Data (Use and Access) Act 2025 (“DUAA”)
- Privacy and Electronic Communications Regulations (“PECR”)
- Solicitors Regulation Authority (SRA) regulatory requirements

Please read this Privacy Policy carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

2. WHAT INFORMATION WE COLLECT

We collect and process personal information directly from you when:

- You become a client
- You contact us by phone, email, post or via our website
- You request information or assistance
- You attend our offices

3. WHAT PERSONAL INFORMATION WE PROCESS

This includes:

- Identity details (name, date of birth, address, NI number)
- Contact details (email, phone number)
- Identity verification documents (passport, driving licence, utility bills)

Wykeham-Hurford Sheppard & Son Ltd is a Limited Company Registered in England & Wales. Company Registered Number OC8444130 which is authorised and regulated by the Solicitors Regulation Authority (number 618701).

A list of Directors' names is available for inspection at the Registered Office

12 High Street, Battle, East Sussex, TN33 0AE



- Financial information (income, bank details, mortgage details)
- Employment/self-employment information
- Family, lifestyle and social circumstances
- Information relating to your legal matter
- Credit history (from credit reference agencies)

4. SPECIAL CATEGORIES OF PERSONAL DATA

We may process special category data where relevant to your matter, such as:

- Health information
- Information relating to vulnerability
- Criminal offence data (where legally required)

We only process this where necessary for your legal matter, where you provide it voluntarily, or where the law permits.

5. HOW WE USE YOUR INFORMATION

We use your information to:

- Provide legal services
- Manage your relationship with us.
- Comply with legal and regulatory obligations
- Prevent financial crime and money laundering
- Maintain internal records and audit trails
- Improve our products and services
- Periodically send newsletters, promotional emails about new services and other information which you have provided.
- From time to time, to use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.

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6. LAWFUL BASIS FOR PROCESSING

We process your information under the following lawful bases:

- **Contract**

To provide legal services, including:

- Assessing your needs
- Providing advice
- Managing your matter
- Communicating with you
- Providing cost information

- **Legal Obligation**

To comply with:

- Anti-money laundering (AML) and counter-terrorist financing legislation
- Solicitors Regulation Authority requirements
- Tax, court and statutory obligations
- DUAA-mandated record-keeping

- **Recognised legitimate Interests (DUAA 2025)**

We rely on recognised legitimate interests for:

- Service improvement
- Internal administration
- Fraud prevention
- Network and information security
- Direct marketing (where permitted)

- **Consent**

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- Marketing communications
- Processing certain special category data

You may withdraw consent at any time.

6. AUTOMATED DECISION MAKING (ADM)

We do **not** make decisions about you based solely on automated processing that produces legal or similarly significant effects.

If this changes, you will have the right to:

- Request human review
- Contest the decision
- Obtain an explanation of the logic involved

7. HOW WE RETAIN YOUR PERSONAL INFORMATION

We will retain your personal information in accordance with applicable laws. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set out above.

Our retention periods are:

Type of Personal Information	Retention Period
General personal data which includes your normal personal data, personal identity and personal financial data	• Up to 12 years after the end of our business relationship with you, or the end of your matter which ever comes later unless your instructions relate to Wills in which case the files and their contents are kept indefinitely
Client Due Diligence Material which includes copies of your Passport, Drivers Licence, Bank Statements and any associated documents and explanations you have given to us to prevent fraud, financial crime and money laundering	• Up to 12 years after the end of our business relationship with you, or the end of your matter which ever comes later



Special categories of personal data

- Up to 12 years after the end of our relationship with you

7. CHILDREN'S DATA

We do not knowingly provide services directly to children without parental authority. Where children's data is processed (e.g., family matters / probate), we apply DUAA aligned safeguards.

8. HOW WE SHARE YOUR INFORMATION

We may share your information with:

- Regulatory authorities (e.g. SRA, ICO, National Crime Agency)
- Credit Reference agencies (identity checks)
- Property search providers
- Insurers
- Estate agents, brokers, lenders and other solicitors involved in your matter
- HMRC, Companies House, Probate Registry, Court of Protection, HM Land Registry
- Barristers, experts and counsel
- Auditors and accreditation bodies

We only share what is necessary and always ensure appropriate safeguards.

9. INTERNATIONAL TRANSFERS

Where your data is transferred outside the UK, we ensure appropriate safeguards including:

- International Data Transfer Agreement (IDTA)
- UK Addendum or EU Standard Contractual Clauses
- Adequacy regulations
- DUAA-compliant transfer assessments



10. HOW LONG WE KEEP YOUR INFORMATION

We retain your information in line with legal and regulatory requirements:

Type of Information	Retention Period
General personal data	15 years after matter/relationship ends
Client Due Diligence (AML)	15 years after matter/relationship ends
Special category data	6 years after relationship ends
Call recordings	1 year
CCTV images	90 days
DUAA-required complaints records	6 years

11. INFORMATION SECURITY

We use appropriate technical and organisational measures to protect your information from:

- Loss
- Misuse
- Unauthorised access
- Alteration
- Disclosure

12. CALL RECORDING AND CCTV

Where we use call recording or CCTV, this is done in accordance with PECR for:

- training and monitoring
- security and fraud prevention
- maintaining accurate records



13. COOKIES AND TRACKING TECHNOLOGIES (PECR)

Our website uses cookies and similar technologies in accordance with the Privacy and Electronic Communications Regulations (PECR). These technologies help us:

- understand how visitors use our website
- improve site performance and security
- remember your preferences
- support analytics and service improvement

Where required by PECR, we will ask for your consent before placing cookies (or similar technologies) on your device. You can withdraw or change your consent at any time using your browser settings or our cookie management tool.

14. ELECTRONIC MARKETING (PECR)

We will only send you electronic marketing communications (such as emails or SMS) where:

- you have given us your consent; or
- you are an existing client and the communication relates to similar services (the “soft opt-in” rule under PECR).

You can opt out of marketing at any time by contacting us or using the unsubscribe option in our communications.

15. YOUR RIGHTS

You have the following rights:

- Access to your personal data
- Correction of inaccurate data
- Erasure (in certain circumstances)
- Restriction of processing
- Data portability
- Objection to processing (including marketing)
- Withdrawal of consent



- Rights relating to automated decision-making

In relation to all of these rights, please write to us at the address below

16. SUBJECT ACCESS REQUESTS (SARs)

We will respond within one month, with the ability to:

- Extend by two months for complex requests
- Pause (“stop the clock”) while verifying identity

17. DATA PROTECTION COMPLAINTS PROCEDURE

If you are unhappy with how we handle your personal data, you may complain using the procedure below.

- Stage 1: Submit your complaint
 - Write to our Data Protection Manager, Sally Reeve
Address: 12 High Street, Battle, East Sussex TN33 0AE
Telephone: 01424 775088
Email: sally.reeve@whss.co.uk
- Stage 2: Acknowledgement
 - We will acknowledge your complaint **within 30 days**, as required by DUAA.
- Stage 3: Investigation
 - We will:
 - Log your complaint
 - Investigate the issues raised
 - Provide a written response
 - Explain any corrective action taken
- Stage 4: Escalation
 - If you remain dissatisfied, you may escalate to the ICO:
 - Information Commissioner’s Office www.ico.org.uk
 - We will provide details of how to do this in our response.

18. UPDATES TO THIS POLICY

We may update this policy from time to time. Significant changes will be communicated directly to clients.



19. CONTACT US

For any data protection queries, raise them with the Data Protection Manager, Sally Reeve

- Address: 12 High Street, Battle, East Sussex TN33 0AE
- Telephone: 01424 775088
- Email: sally.reeve@whss.co.uk

Effective Date 19th June 2026

Updated for DUAA, UK GDPR and PECR 2026