
Messrs. Hoare Trustees

Privacy Notice

ABOUT THIS NOTICE

Messrs. Hoare Trustees is committed to protecting your personal information when you use our services. This notice explains how we collect, retain and process your personal information.

This is a short-form notice detailing how Messrs. Hoare Trustees specifically deals with your personal information. For full processing details, please refer to the C. Hoare & Co. Privacy Notice available on our website hoaresbank.co.uk/privacy (the “**Bank Notice**”).

YOUR RIGHTS REGARDING PROCESSING OF YOUR PERSONAL INFORMATION

Under certain circumstances, by law you have the right to:

- object to processing of your personal information
- request access to the personal information we hold about you
- request correction of the personal information that we hold about you.
- request erasure of your personal information
- request the restriction of processing of your personal information
- request the transfer of your personal information to another party in a commonly used form.

For more information on your rights, please see the Bank Notice. To exercise one of these rights, please see the ‘Contacting Us’ section which provides various ways that you can get in touch with us.

CONTACTING US

Messrs. Hoare Trustees is a wholly owned subsidiary of C. Hoare & Co. For the purposes of data protection legislation, C. Hoare & Co is the “controller” meaning that it determines the purpose and means of processing the information we collect from and about you.

If you ever have any questions, comments or complaints about this notice, or any of its contents, please contact us via any of the following means and we will be pleased to assist you:

By post	The Data Protection Officer, 37 Fleet Street, London EC4P 4DQ
By email	DPO@hoaresbank.co.uk
By phone	+44 (0)20 7353 4522

1. YOUR PERSONAL INFORMATION

This section sets out how the personal information that we collect about you will be used.

We are committed to observing relevant legal and regulatory requirements and employing appropriate security measures in order to protect your personal information.

1.1. INFORMATION THAT WE COLLECT

We may collect the following types of information about you:

- information that you provide to us regarding details of settlors, trustees, beneficiaries, testators, donors and legatees
- information you have provided to C. Hoare & Co. where you have requested our services
- information that you may provide to us about your family and other relationships relevant to the products and services we provide. We will assume that you have the authority to share this information with us and will treat it with the upmost confidence.

1.2 HOW WE USE YOUR INFORMATION

We use your information to:

- draft wills
- act as Trustees, Custodian trustee and/or agents for different types of Trusts
- act as Executors/Trustees/Attorney administrator of wills
- administration of Trusts/Estates.

Information used for marketing and analytical purposes

We use information that we hold about you to identify events that we think you may wish to attend or products and services that we think may be of value to you.

The information we use to make these decisions includes both details you decide to share with us directly, and details collected through your interactions with the bank, such as your recent transactions or use of services and systems.

We will only contact you for marketing purposes if you have given us consent to do so.

We may share basic details with venues or hosts if you choose to attend an event but we will never sell or transfer your data to a third party to use for direct marketing without your knowledge and consent.

You have the right to ask us not to send you marketing messages by post, telephone or email or any combination of these at any time. You can do this by:

- contacting our Data Protection Officer
- checking certain boxes on the forms we use to collect your data
- replying directly to the marketing message.

We use a variety of innovative analytical tools and techniques and we may perform analysis, data matching and profiling using your information. This may affect the products and services that we may offer you, or the price we charge you for them.

We will do this to:

- keep your accounts safe from potential fraud
- personalise conversations and offers to identify potential products and services or events that may be of value to you based on your feedback, expectations and preferences, or based on customers in a similar segment or with similar circumstances

These activities may be done manually but we also use automated machine learning tools to be as accurate as we can. We would never make a purely automated decision concerning you and we have suitable checks in place to ensure outcomes are fair and in line with your interests.

2 LAWFUL PROCESSING

We will rely on the following legal basis to process your information:

- where you have consented to such use
- for the performance of a contract with you for provision of our products and/or services or to take steps at your request prior to entering into such a contract
- to comply with our legal obligations
- where it is in the substantial public interest
- for our legitimate interests in
 - communicating with you
 - keeping the bank and your information secure including protecting against fraud
 - responding to any incidents or complaints
 - ensuring the quality of the products and services we provide to you
 - collecting information for marketing purposes
 - managing and developing our technologies
 - meeting our regulatory obligations
 - business development
 - statistical analysis.

We process your sensitive and special categories of information (this includes data concerning your health, personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, biometric data or data concerning sexual orientation) where we have asked for your explicit consent or otherwise where this is necessary:

- where we need to carry out our legal obligations
- where it is in the substantial public interest
- for the establishment, exercise or defence of legal claims.

If provision of your personal information is a legal or contractual requirement or a requirement necessary to enter into a contract with us, and you choose not to provide it, we may not be able to perform some of the tasks we need to in order to provide certain products or services to you.

If you do choose to provide your consent, you can withdraw it at any time by contacting our Data Protection Officer (see 'Contacting Us' section above).

3 SHARING YOUR INFORMATION

Your information is necessarily shared with C. Hoare & Co. however, we will not pass your information on to third parties except in the following cases:

- we will provide your information to our service providers to allow them to assist us with delivering the products or services that you have requested. Please see the Bank Notice for details of the types of service providers we will share data with
- additional third parties detailed in the Bank Notice.

4 KEEPING YOUR INFORMATION

We will keep your information only for as long as necessary depending on the purpose for which it was provided. Due to the nature of the work of Messrs. Hoare Trustees, we are frequently required to hold details relating to the services we provide as a subsidiary of the bank for long periods of time.

Please see the Bank Notice for details of the factors taken into account when assessing the relevant retention periods. For more information, please contact our Data Protection Officer (see 'Contacting Us' section above).

5 SECURITY

We have put in place measures to protect the security of your information. Please see the Bank Notice for further details.

6 CHANGES TO OUR PRIVACY NOTICE

Any changes we may make in the future will be posted on our website and in the most recent version of this Privacy Notice. Where appropriate, changes may be notified to you by post or email.

7. RIGHT TO COMPLAIN

If you are unhappy with how we have handled your information, contact the Data Protection Officer. If you are not satisfied with our response to your complaint, or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office ("ICO"):

- ico.org.uk/global/contact-us/
- ICO Helpline: 0303 123 1113.

Messrs. Hoare Trustees

37 Fleet Street

London EC4P 4DQ

T: +44 (0)20 7353 4522

F: +44 (0)20 7353 4521

www.hoaresbank.co.uk

Email: enquiries@hoaresbank.co.uk

WEBSITE: www.hoaresbank.co.uk

SWIFT: HOABGB2L DX: 125 London/Chancery Lane

Incorporated by Private Act of Parliament Registration No. ZC000159

Regd. Office: 37 Fleet Street London EC4P 4DQ