

# zenplans

## Privacy & Cookies Policy

**Version number:** 2.1

**Effective date:** 23 February 2023

### 1. Who are we?

**1.1** We are Zen Plans Limited. For privacy queries, you can contact us at [hello@zenplans.co.uk](mailto:hello@zenplans.co.uk).

### 2. What's the point of this policy?

**2.1** It tells you what to expect when we collect personal information from our clients and from users of our Zenplans web app (including via a sponsor white-labelled version) and website. Please only use them if you are completely happy with this policy. By "personal information" we mean information that relates to an identified or identifiable individual. See below for information about the kinds of personal information we collect.

**2.2** Our service is aimed at users aged 18+ and we don't knowingly collect information from children.

**2.3** Generally, the policy covers only information provided to us. If you give personal information to other people, such as payment providers or other websites, please check their privacy policies.

### 3. Might the policy change?

**3.1** Yes. We will give you notice of the new version by placing a message on our web app and website and, if the changes are important, by email also.

### 4. What do we collect?

**4.1** Information which you upload to our service or otherwise give us such as:

- your name and contact details and those of your authorised users if you are a sponsor/organisation;
- digital estate data input into our service (i.e., assets, debts, wishes, daily life and similar or related information) relating to you and, if applicable, to others such as your family members;
- the names and contact details of your proposed delegates;
- account information such as your Zenplans username and password;
- details about your transactions on our service;
- information that you include in communications with us including surveys and feedback;
- contact or other information which you give or allow us to use for newsletters or other marketing; and
- any other personal information that you may choose to provide to us from time to time.

**4.2** Some of the above information may be "special category data", such as details relating to your health or religious beliefs.

**4.3** Automated information about your use of our service such as: the internet protocol (IP) address used to connect your device to the internet, connection information such as browser type and version, information about your device including device-type and device identifier, operating system and platform, mobile network data, a unique reference number linked to the data you enter on our system, login details, the site from which you arrived at our service, details of your activity with date / time stamps including pages you visited and your searches / transactions. We will seek your consent to process automated information about you, where required.

**4.4** The following information about you may be provided to us by other people:

- Limited billing information sent to us by our payment provider for verification purposes e.g., your name, email address and billing address.
- Your name and contact information, if you are a delegate.
- If you log in via social media or other websites: Information from those companies potentially including your name, email address and date of birth.

## **5. What's our reason / legal basis for collecting the information?**

**5.1** Because it's necessary to take steps at your request to enter into a contract with you and/or to perform such a contract. This applies to information such as initial enquiries and to account, contact, transaction and authorised user information. Without this information, we may not be able to provide some or all of our services to you.

**5.2** Because it's in our "legitimate interests" (or that of others), e.g., collecting names and contact details of your proposed delegates, enabling connected plan-holders, delegates and sponsors to communicate with each other including via our service in connection with the plan-holder's plan, sending marketing communications to customers about our similar products, administering, managing and improving our service including tracking usage patterns and preventing or detecting fraud or abuse. This applies to information such as contact details, automated usage and to surveys and feedback. We will ensure that these "legitimate interests" will be balanced against the rights and freedoms of the individuals whose personal data we process and that such use of personal information does not unduly interfere with those rights.

**5.3** Because you've specifically agreed on our service (e.g., by selecting a consent box). This applies to "special category data" (explained above) relating to you or others, This may also apply to contact or other information that you specifically agree to us or sponsors using for certain kinds of marketing. If you have given consent, you can withdraw permission at any time as explained on our service or by emailing us at the above email address.

**5.4** Because it's necessary to comply with legal or regulatory obligations.

## **6. How long do we keep personal information?**

**6.1** We will generally hold your information for our default standard retention period of six years plus the current year (in line with legal limitation period and tax record requirements), but we may delete it earlier/later as set out below or in our terms and conditions.

- 6.2** We will keep digital estate data input into our service and user support tickets until 12 months after the end of the contract.
- 6.3** We will keep the names and contact details of proposed delegates for 12 months if they do not sign up with us in the meantime.
- 6.4** We will keep documents evidencing death or loss of capacity for 12 months.
- 6.5** We will keep your information which we use only for newsletters or other marketing until you tell us to stop sending you such messages or if you don't refresh consent if we ask you to.
- 6.6** We will generally keep automated browsing information for up to 26 months (in line with the Google Analytics default retention period, and we may change this accordingly).
- 7. To whom do we send or make available your personal information?**
- 7.1** To other people who supply us with a service, e.g., hosts, payment providers, customer service providers, and businesses which help us send communications or monitor our service and which provide us with e-commerce, online advertising, analytics, social media, customer survey and other services.
- 7.2** To other users of our service as follows:
- if you are a plan-holder, your digital estate data will be made available to your delegates in accordance with the permissions you set (and delegates who are also sponsors will be notified of your changes to your plan);
  - if you are a plan-holder, your name and contact details and the plan creation date will be displayed to your sponsor;
  - if you are a delegate, your name, age and relationship to the plan-holder will be displayed to the plan-holder's sponsor to enable them to contact you via our service in relation to the plan-holder's plan; and
  - if you are a sponsor, the name and contact details of the sponsor's authorised user will be displayed to the plan-holder and their delegates to enable them to contact you in relation to the plan-holder's plan.
- 7.3** To regulators, the police and other law enforcement or official authorities to help deal with fraud and abuse and/or comply with legal requirements and/or to protect us or others.
- 7.4** To insurers and professional advisers in connection with our insurance cover or to deal with legal claims.
- 7.5** To potential buyers so far as reasonably necessary, in the case of an actual or proposed (including negotiations for a) sale or merger or business combination involving all or the relevant part of our business.
- 7.6** To anyone else, with your consent.

## 8. Do we send your information outside the UK?

**8.1** Your personal information (e.g., name, contact details, digital estate data, IP address, browsing information) may be transferred outside the UK (generally to the US) by some of the companies that provide us with hosting, analytics, advertising, email, social media and other services. If so, we will ensure that there is a legal basis to do so, for example under contracts with standard contractual clauses sanctioned by the Information Commissioner that are designed to provide adequate safeguards for your personal information. Please visit [their website](#) if you would like to see the clauses.

## 9. What rights do you have?

**9.1** If the legal requirements are met: To ask us for access to your personal information, to rectify it if there are mistakes, to delete it or restrict its use in certain circumstances or to “data portability” or to withdraw any consent you’ve given (e.g. marketing).

**9.2** You may also have the right to object to use of your personal information in certain circumstances.

**9.3** You can exercise your rights by sending an email to the email address at the start of this document. Note that we are entitled to ask for verification of your identity and to clarify your request. We will respond within whichever timescale then applies under data protection laws.

**9.4** If you have a complaint about how we are dealing with your personal information, please contact us via the email address above. If you are not happy with our response or think we are not handling your personal information in accordance with the law, you have the right to complain to the Information Commissioner’s Office (ICO).

**9.5** For more information about your rights, visit the ICO’s website: [www.ico.org.uk](http://www.ico.org.uk).

## 10. What about cookies?

**10.1** We and/or other companies use cookies and other tracking technologies on our website. A cookie is an identifier (a small file of letters and numbers) that is sent to your web browser. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website owner or others. Some are session temporary “session” cookies that remain in the cookie file of your browser only until your browser is closed. Whereas persistent cookies stay for longer (depending on the lifetime of the specific cookie). For further information on cookies, including how to use your browser to block them and how to delete existing cookies, visit: [www.allaboutcookies.org](http://www.allaboutcookies.org). Our site’s functionality will be limited if you configure your browser to reject cookies.

**10.2** We ourselves may place the following types of cookies:

Type of cookie	Purpose
Wordpress theme	To allow us to implement or change the website's content in real-time.

Cookie notice	Store your response to our cookie notice
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**10.3** Companies which provide us with a service also place cookies. Some of these cookies may involve certain information, such as your name and contact details and/or the IP and web address of the page you're visiting, being sent to the company concerned. Below is a summary of the kinds of cookies used together with details about who places them and where you can go to get more information and to opt out (where possible):

- **Analytics cookies:** These kinds of cookies recognise and count the number of website visitors as well as providing other information about the visit such as duration, route through the website and where the visitor came from. This information helps us to improve the way our website works, for example by making sure users find what they need easily. These cookies are provided by:
  - *Google Analytics ("GA").* More information:
    - Google's [overview of GA data practices and safeguarding](#)
    - how to specifically [opt out from GA cookies](#)
    - Google's [use of its partners' data](#)
- **YouTube cookies:** These kinds of cookies are used to facilitate YouTube videos embedded on our service including storing your video player preferences and storing a unique ID so YouTube can keep a record of the YouTube videos you have seen. See here for further information: [Google's Cookies Policy](#)