



PROFESSIONAL CLINICAL WILLS

Professional Clinical Wills

Privacy Notice

Effective date: 1 July 2023

Last updated: 4 September 2026

Professional Clinical Wills ("we", "us" or "our") respects your privacy and is committed to protecting your personal information.

This Privacy Notice explains how we collect, use, store and protect personal information when you use our services, visit our website or communicate with us.

We process personal information in accordance with the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 and other applicable UK data protection legislation.

1. Who we are

Professional Clinical Wills is responsible for the processing of personal information described in this Privacy Notice.

Professional Clinical Wills

Suite 3, Censeo House
6 St Peter's Street
St Albans
AL1 3LF

Email: info@professionalclinicalwills.com

ICO registration number: ZA391759

For questions about this Privacy Notice or how we handle personal information, please contact us using the details above.

2. Whose information do we process?

Depending on how you interact with us, we may process information relating to:

- practitioners and professionals who use our clinical will service;
- prospective customers who contact us;
- clients, patients, supervisees or other individuals whose information is included within a practitioner's clinical will;

- professionals or other people nominated by a practitioner;
- website visitors;
- individuals who contact us with an enquiry or complaint;
- suppliers and professional advisers.

3. Information we collect

Practitioners and customers

When you use our clinical will service, we may collect:

- name;
- professional title and profession;
- professional registration information;
- business/practice details;
- postal address;
- telephone number;
- email address;
- information relating to your clinical will arrangements;
- details of nominated professionals or other responsible individuals;
- account and login information;
- payment and subscription information;
- correspondence and communications with you.

Information contained within clinical wills

A practitioner may choose to include information about clients, patients, supervisees, colleagues, professional contacts or other individuals within their clinical will.

This may include:

- names;
- contact details;
- emergency contact details;
- professional relationships;
- information concerning arrangements to be followed if the practitioner becomes unavailable;
- relevant clinical or health information;
- other information that the practitioner considers necessary to implement their clinical will arrangements.

Some of this information may constitute **special-category personal data**, including health information, and is subject to additional legal protections.

We encourage practitioners to include only information that is necessary and proportionate for the purpose of their clinical will.

Information collected through our website

If you contact us through our website, we may collect information such as:

- your name;
- email address;
- telephone number;
- information contained in your enquiry;
- any other information you choose to provide.

4. How we use personal information

We may use personal information to:

- provide and administer our clinical will service;
- create, maintain and update clinical wills;
- communicate with practitioners and customers;
- send service related reminders and notifications;
- provide customer support;
- manage subscriptions and payments;
- administer accounts;
- maintain the security of our systems;
- prevent fraud, misuse or unauthorised access;
- respond to enquiries and complaints;
- comply with legal and regulatory obligations;
- maintain appropriate business records;
- improve our services;
- manage our suppliers and professional advisers;
- establish, exercise or defend legal claims.

We will only use personal information where we have a lawful basis to do so.

5. Our lawful bases for processing

Under the UK GDPR, we must have a lawful basis for processing personal information.

Depending on the circumstances, we may rely on:

Contract

We may process information where this is necessary to provide our services to you or to take steps at your request before entering into a contract.

For example, this may include creating and maintaining your clinical will and administering your account.

Legitimate interests

We may process information where this is necessary for our legitimate interests, provided those interests are not overridden by your rights and interests.

Examples may include:

- maintaining and securing our systems;
- administering our business;
- responding to enquiries;
- preventing misuse or fraud;
- maintaining appropriate business records;
- defending legal claims.

Legal obligation

We may process information where necessary to comply with a legal or regulatory obligation.

Consent

Where appropriate, we may rely on your consent.

Where we rely on consent, you may withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn.

6. Special-category personal data

Some information contained within a clinical will may constitute special category personal data under the UK GDPR, including information concerning health.

Special category data requires additional protection.

Where we process special category data, we will identify and rely upon an appropriate condition under Article 9 of the UK GDPR in addition to an Article 6 lawful basis.

The applicable condition will depend on the circumstances and the role Professional Clinical Wills is performing in relation to the particular processing.

We will take appropriate technical and organisational measures to protect special category information.

We will also seek to minimise the amount of sensitive information processed and encourage practitioners to include only information that is necessary for the purpose of their clinical will.

7. Who is responsible for client information contained in a clinical will?

A practitioner using our service may determine why and how information relating to their clients or patients is included within their clinical will.

Depending on the circumstances, the practitioner may therefore act as the **data controller**, with Professional Clinical Wills acting as a **data processor** when processing that information on the practitioner's documented instructions.

Where Professional Clinical Wills determines the purposes and means of processing information itself, we may act as a data controller.

The precise responsibilities of each party will depend on the nature of the processing and the contractual arrangements in place.

Where required, appropriate Data Processing Agreements will be entered into.

8. Sharing personal information

We do not sell personal information.

We may share personal information where there is a lawful basis and where sharing is necessary for the purposes described in this Privacy Notice.

This may include sharing information with:

- authorised professional executors;
- nominated individuals identified in a clinical will;
- technology and software providers;
- hosting and infrastructure providers;
- payment service providers;
- IT and security providers;
- professional advisers;
- regulators or public authorities where legally required;
- law enforcement agencies where required by law;
- other service providers who process information on our behalf.

Where another organisation processes personal information for us, we will take appropriate steps to ensure that suitable contractual and security arrangements are in place.

9. Our technology and hosting providers

Clinical wills are stored electronically using our clinical will documentation within MS Teams.

Hosting provider: Gridserve

Hosting location: 9 Patford Street, Calne, Wiltshire, SN11 0EF

Microsoft 365 services used:

- Microsoft Teams
- SharePoint Online
- Microsoft Entra ID (Azure Active Directory)

Other relevant sub-processors: Microsoft Corporation (Microsoft 365 services including Teams, SharePoint Online and Entra ID)

We will maintain appropriate records of relevant third-party service providers involved in processing personal information.

10. Security of your information

We take the security of personal information seriously.

We use appropriate technical and organisational measures designed to protect information against:

- unauthorised access;
- accidental loss;
- destruction;
- alteration;
- unauthorised disclosure;
- unlawful processing.

Depending on the system and circumstances, these measures may include:

- access controls;
- authentication;
- multi-factor authentication;
- encryption;
- secure hosting;
- backups;
- system monitoring;
- access logging;
- security updates;
- confidentiality obligations.

Important: Specific technical details relating to encryption, MFA, hosting and audit logging should only be included here once they have been confirmed by our software/IT provider.

11. Passwords and access credentials

Where a clinical will contains passwords or other access credentials, we recognise that these are particularly sensitive information.

We will apply appropriate security measures to protect such information.

Practitioners should avoid providing unnecessary passwords or access credentials and should only include credentials where they are genuinely required to implement their clinical will arrangements.

12. How long we keep information

We will only retain personal information for as long as it is reasonably necessary for the purposes for which it was collected, taking into account:

- the nature of the information;
- the purpose for which it is being processed;
- our contractual obligations;
- legal and regulatory requirements;
- the establishment, exercise or defence of legal claims;
- our legitimate business requirements.

Our retention periods may differ depending on the type of information.

Clinical wills

Clinical wills will generally be retained while the practitioner's service remains active and for any additional period required to fulfil legal, contractual or legitimate business requirements.

Specific retention period following termination: 1 month after termination of subscription

Backups

Where information is held within backups, deletion may take place in accordance with the backup system's retention cycle of 60 days.

13. What happens when you cancel your service?

If you terminate your Professional Clinical Wills service, we will deal with your personal information in accordance with our contractual arrangements and applicable data protection law.

Where applicable, you will be provided with information about the process for retrieving or transferring your clinical will information.

Personal information will then be deleted or retained only where there is a lawful reason for us to retain it.

Where Professional Clinical Wills is acting as a data processor, information will be returned or deleted in accordance with the relevant Data Processing Agreement and the controller's instructions, subject to any legal requirement to retain the information.

14. What happens if Professional Clinical Wills ceases trading?

We recognise the importance of ensuring that clinical will information remains appropriately protected if our business operations change or cease.

If Professional Clinical Wills ceases trading, we will take appropriate steps to ensure that personal information is returned, transferred or securely deleted in accordance with applicable legal and contractual obligations.

For customers who are deceased, we will retain only the information that we are legally or contractually required to keep in accordance with their document retention policy. Once the applicable retention period has expired, that information will be securely deleted.

15. International transfers

We will identify whether any personal information is transferred to, or made accessible from, countries outside the UK.

Where personal information is transferred outside the UK, we will ensure that the transfer is made in accordance with applicable UK data protection legislation and that appropriate safeguards are in place.

16. Your data protection rights

Depending on the circumstances, you may have the following rights under UK data protection law:

- **The right to be informed** about how your personal information is used.
- **The right of access** to personal information we hold about you.
- **The right to rectification** of inaccurate or incomplete personal information.
- **The right to erasure** of personal information in certain circumstances.
- **The right to restriction of processing** in certain circumstances.
- **The right to object** to certain types of processing.
- **The right to data portability** in certain circumstances.
- **Rights relating to automated decision-making and profiling**, where applicable.

These rights are subject to certain legal conditions and exemptions and may not apply in every circumstance.

17. How to exercise your rights

To exercise any of your data protection rights, please contact:

Professional Clinical Wills

Suite 3, Censeo House
6 St Peter's Street
St Albans
AL1 3LF

Email: info@professionalclinicalwills.com

Please provide enough information to allow us to identify you and understand your request.

We may need to request additional information to verify your identity before providing personal information or making changes.

We will normally respond to valid requests within one month, subject to the applicable legal requirements.

18. Complaints

If you have any concerns about the way we have handled your personal information, we encourage you to contact us first so that we can investigate and try to resolve your concern.

Please contact:

Professional Clinical Wills

Email: info@professionalclinicalwills.com

You also have the right to complain to the Information Commissioner's Office (ICO), which is the UK's independent regulator for data protection.

Information about making a complaint is available from the ICO.

ICO website: <https://ico.org.uk/make-a-complaint/>

19. Website and cookies

When you visit our website, we may collect certain technical information, such as information about your device, browser and how you interact with the website.

We may use cookies and similar technologies to operate and improve our website and, where applicable, to understand website usage.

Where consent is required for cookies or similar technologies, we will obtain it in accordance with applicable law.

20. Marketing communications

Where we send marketing communications, we will comply with applicable data protection and electronic marketing laws.

We will provide an appropriate means of opting out of marketing communications.

You can ask us to stop sending marketing communications at any time by contacting us or using the unsubscribe mechanism included in the communication.

Service related communications, such as information about your account, clinical will or subscription, are not marketing communications and may still be sent where necessary to provide the service.

21. Accuracy of information

We take reasonable steps to ensure that personal information we hold is accurate and up to date.

However, practitioners are responsible for ensuring that information they provide for inclusion in their clinical will is accurate and remains appropriate.

We encourage practitioners to review their clinical wills regularly and update them whenever their circumstances or professional arrangements change.

22. Confidentiality

We recognise that clinical will information can be highly confidential.

Access to information is restricted to authorised individuals who require access for legitimate purposes.

Individuals who are authorised to access confidential information are subject to appropriate confidentiality obligations.

23. Data breaches

If we become aware of a personal data breach, we will assess the incident and take appropriate action.

This may include:

- containing the breach;
- investigating what happened;
- assessing the risk to affected individuals;
- taking steps to prevent recurrence;
- notifying the ICO where legally required;
- notifying affected individuals where legally required.

24. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect:

- changes in our services;
- changes to our technology;
- changes to our suppliers;
- changes in data protection law;
- changes in how we process personal information.

The latest version will be published on our website.

Last updated: 4 September 2026

25. Contact us

If you have any questions about this Privacy Notice or how Professional Clinical Wills handles personal information, please contact us:

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Email: info@professionalclinicalwills.com

Telephone: 07591 662721

ICO registration number: ZA391759