

# Vault360 – Your Data & Your Control

Effective from: 01 April 2026

Next review date: 01 April 2027

## Plain English Summary

Vault360 is developed to store some of the most significant information in your life. This section provides a straightforward explanation of how your data is managed.

### Your Control

With Vault360, you remain in charge of your data at all times. You choose what information to include in your Vault, and you decide who can access it. Your information will not be shared with third parties unless you specifically request it or grant explicit permission.

### Your Data is Private

Your information is securely stored and protected through encryption. Vault360 does not sell your personal data, nor do we share your information for marketing purposes without your consent. Vault360 does not access or review the contents of your personal data except where necessary to operate, maintain, or support the platform (for example, to investigate technical issues or respond to a support request), and only to the extent required.

### Access After Death

Access to your Vault is not automatic following your death. Instead, a nominated law firm must verify both the death certificate and the identity of the person requesting access. Only when these requirements are satisfied will access be granted.

### Trusted Providers

Vault360 may recommend services, such as financial advisers or estate agents. If you decide to use these services, we may receive a referral fee. However, your data will only be shared if you explicitly agree.

### Your Rights

Under UK data protection law, you have the right to access your data, correct it, delete it, and request a copy.

### Questions and Concerns

If anything seems amiss or you have concerns, you are welcome to contact us at any time.

# Vault360 – Privacy Policy

## 1. Introduction

This Privacy Policy outlines how Vaultworks Limited (“Vault360”, “we”, “us”) collects, uses, and protects your personal data. Vaultworks Limited acts as the data controller for your personal information.

## 2. What Data We Collect

### 2.1 Account Information

We collect your name, email address, contact details, date of birth, and login credentials.

### 2.2 Vault Data (User-Provided)

This includes financial information (such as assets and liabilities), personal records (including identity details and documents), and estate planning information and personal wishes.

### 2.3 Technical Data

We gather device information, IP address, and log data.

## 3. Special Category and Sensitive Data

Vault360 may process highly sensitive personal data, such as identity documents, financial records, and information relating to personal circumstances and wishes. This information is only stored if you choose to upload or input it.

## 4. How We Use Your Data

Your data is used to provide and operate the Vault360 platform, enable secure storage and controlled sharing, facilitate access according to your instructions, and maintain, improve, and secure the service. We do not sell your personal data.

## 5. Legal Basis for Processing

Vault360 processes personal data under the UK General Data Protection Regulation (GDPR) based on contractual necessity to provide the service, legitimate interests to operate, secure, and improve the platform, and legal obligations where required by law.

For special category data, processing is based on explicit consent, which you give when you upload or input such information. You may remove or delete this data at any time, subject to legal or technical restrictions.

## 6. Data Sharing

We may share your data in the following circumstances:

- With People You Authorise: Partners, executors, or advisers you grant access to.
- With Nominated Law Firms: To verify and control the release of Vault access after death.
- With Service Providers: Trusted providers supporting hosting, infrastructure, and security.
- With Third-Party Providers (Referrals): Vault360 may introduce you to third-party service providers, such as financial advisers or estate agents. If you choose to engage their services, we may receive a referral fee. Your personal data is only shared if you give explicit consent.

## 7. Data Security

Vault360 employs technical and organisational measures, including encryption (such as client-side encryption where applicable) and access controls with authentication safeguards. While robust security is implemented, no system can be guaranteed to be entirely secure.

### 7.1 How your data is secured and who can access it

Vault360 is designed to protect your information through a combination of encryption, access controls, and secure infrastructure.

#### **Encryption and storage**

Your data is encrypted in transit and at rest. Where applicable, Vault360 uses encryption mechanisms designed so that sensitive information remains protected from unauthorised access.

#### **Access by you and those you authorise**

Your information is accessible only to you and to individuals or organisations you explicitly authorise within the platform, such as nominated executors or professional advisers.

#### **Access by Vault360**

Vault360 does not access or review the contents of your personal data except where necessary to operate, maintain, or support the platform (for example, to investigate technical issues or respond to a support request), and only to the extent required. Access to systems is restricted and subject to appropriate internal controls.

### **Client-side encryption (where applicable)**

Where Vault360 implements client-side encryption, certain sensitive data may be encrypted in a way that limits Vault360's ability to access the underlying content. Users should be aware that this may affect the ability to recover data in certain circumstances (for example, if access credentials are lost).

### **No sale of personal data**

Vault360 does not sell your personal data. Your information is only shared with third parties where necessary to provide the service or where you have given explicit consent.

## **8. Data Retention**

Personal data is retained only for as long as necessary for the purposes outlined in this policy.

- **Account Data:** Retained while your account remains active. After closure, data may be kept for up to seven years unless earlier deletion is requested or required.
- **Post-Death Access:** When Vault access is granted after death, data may be retained for the duration of estate administration. Afterwards, data may be deleted, anonymised, or kept where required by law.
- **Legal Requirements:** Certain data may be retained to comply with legal obligations, resolve disputes, or enforce agreements.

## **9. Your Rights**

Under the UK GDPR, you have the right to access your personal data, correct inaccurate information, request deletion of your data, restrict or object to processing, and request a copy of your data (data portability). You can exercise these rights from within the platform or by contacting us.

## **10. International Transfers**

If your data is transferred outside the UK, Vault360 ensures appropriate safeguards are in place.

## **11. Cookies and Tracking**

Vault360 may use cookies and similar technologies to maintain secure sessions and enhance user experience.

## **12. Changes to This Policy**

This Privacy Policy may be updated from time to time. Where applicable, you will be notified of significant changes.

## 13. Contact Details

Vault360 is operated by Vaultworks Limited, which is the data controller for your personal data. You can contact us by email at **support@vaultworks.co.uk** or at our registered address, 18 St Leonard's Avenue, Basingstoke, RG24 8RD.

## 14. Your Right to Complain

If you have concerns about the handling of your data, we encourage you to contact us initially. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection. Visit their website or call their helpline on 0303 123 1113.