

Our Privacy Statement

Authorised and Regulated by The Financial Conduct Authority

FRN Number 191962

Data Protection Registration Number Z5970597

Our Privacy Notice

This notice covers our requirement to provide you with information on how and why we use your personal data and your rights under the Data Protection Act. It also tells you what to expect when Adcock Financial Limited collects personal information about you.

Personal Information

Personal Information denotes:

- Information you provide when you make contact with us via our website
- Information you provide when completing an application form, a fact find document, our cash flow forecast questionnaire or other questionnaires that may be required in order for us to fulfil our obligations to you
- Information that you provide us with through direct interaction such as over the phone, via email, via remote meetings or at face to face meetings
- Any other information you provide us with

By providing us with information about yourself, you are considered to be a Data Subject.

The Data Protection Principles

As we are responsible for gathering and using your personal information, we have to follow strict rules called the data protection principles. As such, we must make sure that your information is:

- ✓ Used fairly and lawfully in a transparent manner
- ✓ Used for explicit and legitimate grounds only
- ✓ Used in a way that is adequate, relevant and not excessive
- ✓ Accurate and kept up to date
- ✓ Kept for no longer than is absolutely necessary
- ✓ Handled according to your rights
- ✓ Kept safe and secure
- ✓ Not transferred outside of the United Kingdom without adequate protection

Who Is Responsible For Your Personal Information

Adcock Financial Limited, as the Data Controller determines the purposes for which and the manner in which any personal data is, or is to be, processed.

Data Controllers must ensure that any processing of personal data for which they are responsible complies with the Act.

The person who is responsible for Data Protection at Adcock Financial Limited is Lesa Oliver-Crawford whose contact details are detailed below.

Why We Gather Personal Information About You

We provide a range of pension, investment, mortgage and financial protection products. We process data provided by you (the Data Subject) and other sources in order to deliver the appropriate products and services to you when you engage us for any financial planning advice, mortgage advice and investment management services.

The reasons for processing your data is mainly to:

- ✓ Assessing your financial needs
- ✓ Developing a personalised financial plan

- √ Recommending financial products and services
- √ Providing you with illustrations and quotations for pension, investment, mortgage and financial protection products
- √ Arranging and administering your pension, investment, mortgage and financial protection plans and policies
- √ Keeping you informed about our products and services

We do not collect more information than we need to meet our obligations to you and will not retain it for longer than is necessary.

If we are arranging a financial protection policy for you for example, then some of the personal information we ask you to provide us with may be sensitive (special category data) such as details about your physical or mental health, genetic data, gender information, racial or ethnic origin. We are allowed by legislation to collect such information and by providing us with this information you are giving your consent for us to do so but it will only be used for the purposes we have set out above.

We will only ever use your personal information for the purpose of progressing your plans or policies, arranging and / or administering your plans and policies, or fulfilling our legal or regulatory requirements such as fraud prevention, helping to prevent financial crime and audit purposes.

If you provide us with information about another person, in doing so, you confirm that they have given you permission to provide it to us and that we may use their personal data in the same way as your own as set out in this Privacy Notice.

Legal Basis For Processing Your Personal Information

We are required to have a lawful basis in order to process your personal data and the relevant bases which apply:

Purpose of Processing
Providing illustrations, quotations, arranging and administering plans and policies
To notify you of changes to our service
To prevent and detect fraud, money laundering and other financial crimes
To meet general legal or regulatory obligations
Provision of information on products and services (Marketing)

Lawful Basis
Necessary for the performance of a contract
Our legal and regulatory obligations
Our legal and regulatory obligations
Our legal and regulatory obligations
Our legitimate interests or your explicit consent

Who Do We Share Your Details With and Why

To meet our regulatory obligations and our obligations to you, we may therefore need to share your personal information with:

Product providers including:

- Providers of financial protection products
- Providers of pension and investment products
- Providers of mortgage products

Regulatory authorities including:

- Financial Conduct Authority
- Financial Ombudsman
- HMRC
- Information Commissioners Office
- Financial Services Compensation Scheme

Law enforcement authorities including:

National Crime Agency
Police
Action Fraud
Office of Financial Sanctions
National Cyber Security Centre

Our service providers including:

External auditors / compliance support providers
IT support provider
Financial services products and services research providers
Anti money laundering service provider
Professional Indemnity Insurance provider
Back office support provider
Website provider

We will not share your information with outside companies for marketing purposes.

If Adcock Financial Limited is bought or taken over, your personal data may be shared with or transferred to a third party to ensure that any financial plans or policies can continue to be serviced. Or, we may need to share your personal data as part of the preliminary discussions about the possible sale, take over or merger.

Data Retention

During our relationship with you we will retain personal data which is necessary to provide services to you. We shall take all reasonable steps to keep your personal data up to date throughout our relationship.

We are also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business
- Indefinitely for pension transfers and opt-out business
- Three years for financial protection business
- Three years for mortgage business

These are minimum periods, during which we have a legal obligation to retain your records. We reserve the right to retain data for longer where we believe it is in our legitimate interests to do so but will not retain your information for longer than 6 years past the time of your death.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

Marketing

If you are an existing customer, we may contact you by email, text, telephone, mail or by other agreed means to keep you up to date about our products or services and to provide you with newsletters. In other circumstances, we can only do so with your explicit consent.

In either case, you are able to opt out of receiving such communications at any time by making contact as detailed below.

Security

We are committed to protecting the security and privacy of all personal information which we obtain and hold about you.

We employ appropriate technical security measures to protect your personal information and ensure that it is not accessed by unauthorised persons. Information is stored on secure computers, and information is encrypted wherever possible.

We use a third party service provider to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to our website.

If You Send Us An Email

Any email you send to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

If You Make A Complaint to Us

If we receive a complaint, we make up a file containing the details of the complaint. The file is likely to contain the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to investigate and process the complaint.

We usually have to disclose the complainant's identity to whomever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We also usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer.

We may also be required to provide a copy of the file to the Financial Ombudsman Service should they be asked to consider the complaint.

We are required to disclose high-level analytics to the Financial Conduct Authority (FCA) concerning the number and nature of any complaints we receive. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 3 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Use of Data Processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Your Rights

You have rights as an individual which you can exercise in relation to the information we hold about you.

Please ask us for an explanation of each should you wish to have more information:

- ✓ The right to be informed
- ✓ The right of access
- ✓ The right to rectification
- ✓ The right to erasure
- ✓ The right to restrict processing
- ✓ The right to portability
- ✓ The right to object
- ✓ Rights to automated decision and profiling

Your Right To Access

You have the right to access any information we hold about you, and the right to know why that data is being processed, how long it's stored for, and who has had or has access to it.

You will not be charged for us supplying you with this information however we do reserve the right to apply a reasonable fee where requests are deemed excessive.

We will respond to any such request within the maximum time frame allowed of one month.

If we are contacted by a third party on your behalf, we will ensure that you have given your authority before we send any information.

Automated Decision Making and Profiling

Automated decision making and profiling refers to situations whereby personal information is gathered and processed solely by automatic means and a decision or evaluation follows without any form of human involvement (i.e. using an algorithm or other computer software). We do not currently use automated decision making or profiling as all decisions and evaluations are reviewed by an individual.

Our Use of Cookies on Our Website

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

Please refer to our Cookie Policy on our website for full details of what cookies we use and why.

You can set your internet browser not to accept cookies and you can visit <http://www.allaboutcookies.org> to help remove cookies from your browser. Please be aware that this may prevent some of our website features functioning properly.

How To Contact Us

For further information on how your information is used, how we maintain the security of your information and your rights to access the information we hold on you or if you would like to make a complaint, you can write to us, email us, or call us as follows:

Lesa Oliver-Crawford
Adcock Financial Limited
The Coach House
Hexgreave Hall
Farnsfield
Nottinghamshire
Tel: 01623 572060
Email: info@adcockfinancial.co.uk

If You Have A Complaint

If you have any concerns about your rights and our practices in relation to data protection, please contact us directly using the details provided above. We will aim to respond to your concerns and clarify how we have processed your information and with whom. We will also endeavour to put right anything that's gone wrong.

If you are still dissatisfied after contacting us, you may report your concern to the Information Commissioner's Office by contacting them as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113
Website: www.ico.org.uk

Changes To This Privacy Notice

We may update this privacy notice from time to time. If we make any significant changes, we will notify you by email or by posting a notice on our website.

Consent

We have provided you with a copy of our Privacy Notice which provides information about the nature of our personal data processing activities and includes details of our retention and deletion policies as well as your rights of access to the personal information that we hold on you.

Sensitive personal data

As explained in our Privacy Notice there are certain categories of personal data that are sensitive by nature. These categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health.

Depending on the nature of the products and services that you engage us for we may need to obtain your sensitive personal data particularly in relation to your health. In the case where we need to process special category (sensitive) data as described above we require your consent by indicating your agreement to the following statement:

I / we consent to the processing of sensitive personal data as far as it is necessary for the services I / we require from Adcock Financial Ltd

Client name(s):	
Client signature(s):	
Date:	

Please note that you may withdraw this consent at any time by notifying us at our main business address.

Marketing

From time to time we may wish to contact you to offer additional products or services which may be of interest to you. To do this, we require your consent by agreeing to one or all the options:

I / we consent to be contacted for marketing purposes by:

Email Telephone Text message Post

Client name(s):	
Client signature(s):	
Date:	

Please note that you may withdraw this consent at any time by notifying us at our main business address.