

BENTLEY INDEPENDENT FINANCIAL ADVISERS LTD EXTERNAL PRIVACY POLICY

1 Introduction

1.1 Bentley Independent Financial Advisers Ltd (“we”, “us”, or “our”) are committed to respecting and protecting your privacy. This Privacy Policy (the “Policy”) explains how we will collect, store and use any personal data you provide via our website, email or networking with our people and when you otherwise communicate with us (including in the course of the financial services we provide or the running of our business).

1.2 Our details are as follows:

Data controller: Bentley Independent Financial Advisers, Waterloo House, Castle Terrace, Bridgnorth, Shropshire, WV16 4AH.

ICO registration number: ICO:00045690088

1.3 This Policy may change from time to time and, if it does, the up-to-date version will always be available on our website and becomes effective immediately.

1.4 Please take the time to read this Policy, which contains important information about the way in which we process personal data.

1.5 For the purposes of this Policy, “European Data Protection Legislation” is defined as, for the periods in which they are in force, the European Data Protection Directive 95/46/EC, all laws giving effect or purporting to give effect to the European Data Protection Directive 95/46/EC (such as the Data Protection Act 1998) or otherwise relating to data protection (to the extent the same apply) and, from 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”) or any equivalent legislation amending, supplementing or replacing the GDPR.

2 Information we may collect about you

2.1 We may collect and process information about you and your personnel through various means, including:

- in the course of carrying out work for you (or your business)
- via our website (e.g. on our ‘Contact Us’ page or our news and insight subscription form, submitting a job application etc.)
- by email or other electronic correspondence
- by telephone
- external events (e.g. at client events and/or other meetings or events either hosted or attended by us)
- otherwise through providing our services or operating our business.

2.2 The personal data you give to us may include:

- your name and title
- contact information, including telephone number, postal address and email address
- information relating to your location, preferences and / or interests
- employment and job application details, e.g. date of birth, employment history, qualifications, equality monitoring information
- photographic identification
- in certain circumstances, your and others’ signature(s), National Insurance number(s), financial details such as bank account details and details of any relevant sanctions or similar restrictions
- in certain circumstances, data relating to health (including disabilities), ethnicity, race, religious beliefs, trade union membership and other ‘special category personal data’
- the content of any enquiry submitted over our website
- any other personal data we collect (such as the client reference number which may be

assigned to you) in the context of our work for our clients or in the course of operating our business.

2.3 Each time you visit our website, we may automatically collect the following information: Web usage information (e.g. IP address), your login information, browser type and version, time zone setting, operating system and platform.

Information about your visit, including the full Uniform Resource Locators (URLs) clickstream to, through and from our website (including date and time); time on page, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs).

Location, device and demographic information (Google Analytics provides age range and gender information. Find out more about how Google collects demographic data).

2.4 We may ask you for information when you report a problem with our website.

2.5 If you contact us, we may keep a record of that correspondence.

3 Cookie Policy

3.1 Our website uses cookies to distinguish you from other users, to improve your experience on our website, and, to recommend content that may be of interest to you. For further details, please contact us.

4 How we will use your information

4.1 We may use your information for the following purposes:

- to respond to any query that you may submit to us
- to manage our relationship with you (and/or your business), including by maintaining our database of clients and other third parties for administration, and accounting and relationship management purposes
- to complete our contractual obligations to you, or otherwise taking steps as described in our engagement terms and/or our Retail Client Agreement (including any associated administration)
- to carry out any relevant conflict checks, anti-money laundering and sanctions checks and fulfilling our obligations under any relevant anti-money laundering law or regulation (including under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017)

5 Legal grounds for processing your information

5.1 We will rely on the following legal bases under European Data Protection Legislation for processing your personal data:

- Performance of, or entry into, a contract. The personal data that we are required to collect in order to comply with any other professional and regulatory obligations which apply to us must be provided to us in order for us to perform this contract – we would not be able to act for you without this personal data.
- Compliance with a legal obligation to which we are subject.
- We have a legitimate interest in doing so as a financial services provider (and where our legitimate interests are not overridden by your (or the relevant individual's) own interests or fundamental rights or freedoms). These legitimate interests will include our interests in managing our relationship with our clients, administering visits to our offices and ascertaining achievement of proper standards/ compliance with policies, practices or procedures.
- Where processing of 'special category data' is necessary in the context of the establishment, exercise or defence of claims. In certain circumstances, such as those described in 4.1 above or where we need to process 'special category data' in the context of our agreed work but outside the scope of paragraph 5.1 above, where we have obtained

your express consent to do so. As we will explain at the time we collect your consent, you may withdraw it at any time in accordance with the information we provide to you at that time.

6 Sharing your information

6.1 We may share your details with carefully selected third parties. These may include service providers, support services and organisations that help us to market our services and third parties instructed to enable us to fulfil our contractual obligations to you and/or our clients in the course of business.

6.2 If we share your information with third parties they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal data. We will only share your personal data in compliance with the European Data Protection Legislation.

6.3 We may disclose your information to third parties when:

- you specifically request this or it is necessary to provide our financial services to you (e.g. when we need to instruct experts in another jurisdiction to provide advice which you have requested)
- we feel other companies' products and services may interest you
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- if our website or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property or safety of our website, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6.4 The third parties include:

- our preferred Product Providers & Investment Houses (including as permitted by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 which, for the purposes of preventing money laundering or terrorist financing, may require us to disclose your personal data)
- our insurers
- our auditors, including external accreditation bodies
- other professional advisors or third parties (including accountants & technical experts) with whom we engage as part of our work for our clients or who our clients separately engage in the same context
- our Regulator, the Financial Conduct Authority (FCA)
- our data processors providing catering, security, email security, data governance, archiving and other IT and business support services
- our email marketing platform provider and our website platform provider
- analytics and search engine providers that assist us in the improvement and optimisation of our website
- any third party you ask us to share your data with.

6.5 Our website may, from time to time, contain links to and from the websites of advertisers and partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

6.6 We will not rent or sell our users' or other contacts' details to any other organisation or individual.

7 Storage and retention of your personal data

7.1 We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. All personal information you register on our website will be located behind a firewall. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot absolutely guarantee the security of your data.

7.2 We will keep your information stored on our systems for as long as it takes to provide the services to you and in accordance with our Terms of Business. We may keep your data for longer than our stated retention period if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research, preventing conflicts of interests or statistical purposes. If we do, we will ensure that appropriate safeguards are in place to protect your privacy and only used for those purposes.

7.3 Any contact details stored on our client relationship management database will be removed from our mailing lists if they do not interact with our emails (i.e. open emails or click on links within them) for a certain period following which they will be moved to an archive folder before being deleted permanently.

7.4 The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you.

7.5 We will, subject to paragraph 7.2, not store your information for longer than is reasonably necessary or required by law.

8 Sending your information outside of the EEA

8.1 If we need to share your personal data with a recipient outside the European Economic Area ("EEA") (e.g. a professional advisor or third party engaged by us or you as part of our work under an engagement letter) we will ensure we do so in compliance with European Data Protection Legislation, including where applicable by ensuring that the transfer is necessary to perform a contract in place with you or a contract entered into in your interests. If these transfers affect you, you may contact us to obtain more precise information and a copy of relevant documentation.

8.2 Our people may access our systems remotely when working abroad (including from jurisdictions outside the European Economic Area). Where they do so, they are required to use our systems and access any personal data in accordance with all the usual policies and procedures.

9 Withdrawal of consent

9.1 Where we process your personal data we do so on the basis that you have provided your consent for us to do so for the purposes set out in this Policy when you submitted your personal data to us. You may withdraw your consent to this processing at any time by contacting us at info@bentleyifa.com or via the web form on our Contact Us page

9.2 If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds and will notify you of these at such time.

10 Your information rights

10.1 European Data Protection Legislation gives you the right to access information held about you. You are entitled to be told by us whether we or someone else on our behalf is processing your personal information; what personal information we hold; details of the

purposes for the processing of your personal information; and details of any third party with whom your personal information has been shared.

10.2 You can access the personal information we hold on you by writing to us at: **FAO: Data Protection Officer, Bentley Independent Financial Advisers, Waterloo House, Castle Terrace, Bridgnorth, Shropshire, WV16 4AH** You can also contact us by email at info@bentleyifa.com or by completing our web form via our **Contact Us** page.

10.3 We will ask you to provide proof of identity before we show you your personal information – this is so we can prevent unauthorised access.

10.4 Please note: For any access request made after 25 May 2018 that is deemed excessive or especially repetitive, we may charge a 'reasonable fee' for meeting that request. Similarly, we may charge a reasonable fee to comply with requests for further copies of the same information. (That fee will be based upon the administrative costs of providing the information).

10.5 You have the additional rights to request rectification and erasure of your personal data and to request restriction of, and to otherwise object to, our processing of your personal data and you can exercise these rights at any time by contacting Sam Sneyd or by completing our web form via our **Contact Us** page.

10.6 From 25 May 2018, you will also be entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise this right from 25 May 2018 by contacting us on info@bentleyifa.com or by completing our web form via our **Contact Us** page.

11 Complaints

11.1 If you consent to us contacting you, we will always aim to be respectful, relevant and appropriate. If at any time you do not think that we have complied with this, please contact us straight away to let us know.

11.2 You also have the right to make a complaint to the Information Commissioner's Office. For more details please visit the ICO website.

12 Contact

Questions, comments and requests regarding this Policy should be addressed to our Data Protection Officer:

Name: **Sam Sneyd**

Address: **Bentley Independent Financial Advisers, Waterloo House, Castle Terrace, Bridgnorth, Shropshire, WV16 4AH**

Email address: ssneyd@bentleyifa.com

Telephone number: **01746 767682**