



Data Protection Notice

The Purpose of this Notice

When we provide our services to you, we will collect personal information about you and we want to be open and transparent with you as to the types of information we collect, why we collect it, how we use it and who we may share it with.

The data controller of your personal information is Herbert Scott Ltd. If you have any questions or concerns about our use of your personal information, then please contact us.

How will my personal data be collected and processed?

We may ask you to provide personal information by filling in hard or electronic copy forms and documents or by corresponding with us by phone, e-mail, letter or otherwise or during our meetings with you.

We collect and process personal data about you for the purposes of providing advice, administration and portfolio management services.

What types of personal data do we collect and why do we collect it?

Identity and contact details: including your name, date of birth, contact details and address, job title, marital status, etc. We may ask to see your identity documents. We do this:

- To carry out money laundering and financial checks and for fraud and crime prevention and detection purposes.
- To collect and process this personal information in order to comply with our legal and regulatory requirements.
- To contact you in order for us to manage, administer and provide our services to you.
- To respond to any correspondence and service-related enquiries you send to us in respect of our services.
- To discuss products or services for which you apply or may be interested in applying for.
- To manage any applications you make for products or services.
- To communicate any updates to you, including any changes to our services, the terms and conditions of any services which we have provided to you or any changes to this Policy and to our websites.
- To contact you to receive your feedback on our services and to participate in related surveys.

Financial information: relating to you, including pension contributions and current values, salary, bank account balances, credit card balances, details of investments and payment cards. We do this:

- To evaluate your eligibility for products.
- To enable us to advise you on your financial circumstances and the appropriateness of specific courses of action and products.
- To collect and process this personal information for our legitimate business interests.
- To enable you to make payments for our services.
- To collect and process this personal information as is necessary for the entry into and performance of any agreements between us (i.e. to assess whether you are eligible for products).

Details of contact that we have had with you: such as meetings, fact-finding discussions and documentation, recommendations, referrals and quotes and details of services you have received:

- To allow us to provide a professional service to you and to contact you with information about other services of ours that we think you may be interested in.

Information about complaints, incidents and feedback:

- To review your feedback and experience with us so we can improve our products and services for you and our other clients.

Details of your dependants (name, address and date of birth):

- To enable us to provide you with services that you have requested that would involve, or have an impact on, your dependant (who may be adults or minors). Where those dependants are adults, please make sure that you have their permission to provide us with their personal information.

Special Category Data

Depending upon the types of products and services you require, we may also need to collect information from and about you that the law considers to be sensitive, which we refer to as "special category personal data".

The special category personal data that we may ask you to provide, and the reasons why we ask you to provide it, are as follows:

Information about your physical or mental health or condition:

- Certain products and services that you request may require this information. Specifically, in order for us to advise you on and to submit applications for health or life insurance products and services.
- This information will be used to obtain accurate quotes and to advise on the suitability of products (as insurance premiums and eligibility for products will, in part, depend on your physical and mental health).
- We will usually collect this information in the course of meetings with you, on specific questionnaires or in the process of completing an application form for such products and services.

Your sex life or sexual orientation, racial or ethnic origin:

- Some providers may ask for this information in the course of your application for their products or services. We will never ask for this information for our own purposes.

You have freedom of choice when it comes to your decision as to whether you provide us with personal or special category personal data and you have the right to request that we stop processing this data at any time.

You should, however, note that if you exercise this right or subsequently request that we stop processing all or part of your personal data and/or special category personal data, this will impact upon our ability to provide you with our services and is likely to result in us being unable to provide them to you at all.

Who might my personal data be shared with?

We may disclose your personal and sensitive category personal data to the following categories of recipients: -

- Providers of financial services, insurance and investment products and services to submit applications on your behalf and receive updates.
- To our suppliers and partners in order for them to help us provide services to you, which includes our IT system providers, marketing providers and audit and regulatory compliance support services.
- With your permission, members of your family, such as your spouse or partner.
- With your permission, your associated professional service providers, such as accountants, solicitors and brokers.
- Other financial institutions or regulatory bodies with whom information is shared for money laundering checks and other fraud and crime prevention purposes.
- To any national and/or international regulatory enforcement body, government agency or court where we believe disclosure is necessary.

Sharing your data with third parties

- We may disclose your personal information to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a Court Order, Regulatory Authority or any other third party with the lawful right to request and receive the personal information we hold about you (including law enforcement agencies and tax authorities).
- We may also use your personal information where it is necessary for us to take legal advice to establish our legal rights, to bring a claim against you or any related parties or to defend a claim from you or any related parties.
- We collect and process this personal information for our legitimate business interests including to carry out our own internal business planning, compliance, training, audit and quality assurance purposes.

Information received from third parties

In some circumstances, we may receive information about you from third parties. For example, we may receive information about you from Credit Reference Agencies and Fraud Prevention Agencies. This may include details of the products and services you have applied for, those lenders, finance and credit organisations with whom you have (and have had) an agreement with, the amounts advanced, the amount and frequency of repayments and whether you have made your repayments on time and in full. This will help us make the best possible assessment of your financial situation before we decide whether we can provide you with our services and/or recommend any specific products and services.

It is in our legitimate interests to process your personal information for this purpose. We may also ask you to provide Letters of Authority to allow us to receive information about you from providers.

When and how do we record communications?

At present, we do not electronically record telephone conversations. Instead, we record these communications via a

written document, which provides a summary of our discussions for our records.

We do electronically save alternative correspondence such as email, instant messaging and other electronic communications.

Some of the personal data that we maintain will be kept in paper files, while other personal data will be included in computerised files and electronic databases.

We record communications between us in order to comply with our legal and regulatory requirements – as a regulated financial adviser, the law requires us to record these communications.

Your Data Protection Rights

You have the following data protection rights;

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time. The reasons why we may not be able to delete your data are outlined in the 'Data Retention' section.
- In addition, you can object to the processing of your personal information, ask us to restrict the processing of your personal information or request the portability of your personal information.
- You have the right to opt out of marketing communications we send you at any time by clicking the unsubscribe link.
- You can withdraw your consent for us to collect and process your personal data at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. In the UK, this is the Information Commissioner's Office (ICO).

Should you wish to exercise your rights, please contact us as detailed in the 'How to contact us' section.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Can I make a complaint?

Yes, we are required to deal with any complaint you might make regarding the use of your data. To make a complaint, please contact us by email, telephone or in writing. Our contact details can be found at the end of this Notice.

You may also complain to the Information Commissioner's Office (ICO) at any time, as we have highlighted to you in the section above.

International Data Transfers

Your personal information may be transferred to and processed in countries other than the country in which you are a resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). Our servers are located in the United Kingdom, but some of our third-party software providers may hold your data in other countries.

We have taken appropriate safeguards to require that your personal information will remain protected in accordance with our own standards, this Notice and applicable law.

Direct marketing

We may wish to provide you with information about new products, services, promotions, and other information in which we think you may be interested. We may provide you such information by post, email and telephone.

Data retention

We must retain personal information we collect from you where we have an ongoing legitimate need to do so, for example:

- to provide you with a product or service you have requested us to provide,
- to perform our contractual obligations to you;
- to comply with applicable legal, tax or accounting requirements;
- to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such claims. This would include complaints and claims that you may bring against us or which are submitted to a court, regulatory authority or ombudsman.

When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or if this is not possible, then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Updates to this Notice

We may change or update this Notice to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

How to contact us

If you would like to contact us in relation to this Notice or if you have any other questions in respect of our processing of your personal information, please contact our Data Protection Officer, Hannah Bibby, on 01273 407500 or enquiries@herbertscott.uk. Or write to us at: Herbert Scott Ltd, The Left Bank, 173 high Street, Lewes, East Sussex, BN7 1YE.