

What Data do we hold?

As Financial Planners and Investment Advisers we can only deliver a service which is as good as the data we hold about your personal and financial circumstances, and your attitudes, hopes and ambitions for the future.

We collect personal data such as your name, address, occupation, earnings, assets, liabilities and outgoings including your tax affairs. We also need to know your age, sex, marital status and details of your partner and immediate family members. We may also need to know about your family businesses and occasionally details of your health. As well as these 'hard' facts we will also keep 'soft' facts such as opinions, tolerances, dislikes and ambitions you tell us about and which we create – through risk profiling for example.

On what lawful basis do we hold your Data?

Without the information we cannot provide you with services. Your decision to engage us and provide us with your personal data is your consent for us to hold and use the data and is an explicit term in our agreement with you. We have a legitimate interest in keeping the data to show in the future that the services provided were well founded.

How do we collect Data?

We collect this information from you in a face to face meeting, or over the telephone, and also through documents you send us and from your other Professional advisers. We may also gather information from other family members.

Who Controls your Data?

We control this data and will only hold the information that is necessary for us to perform the services we provide to you in accordance with our Privacy Policy.

How long will we hold your Data?

We will hold information indefinitely so that we can always demonstrate that the advice provided was suitable at the time it was given.

We establish client relationships through the provision of an initial consultancy at which the first Information is collected. If no advice is given and a client relationship is not created we will destroy any records of the meeting on or before the expiry of two years. If we have provided advice we will store the data for as long as is necessary to be able to demonstrate that the advice given was suitable at the time it was given – whether the advice was freely provided or charged for, and regardless of whether we have entered into a written client services and cost agreement with you. The standard agreement is published on our website at all times.

How do we comply with regulation?

Your information is protected in law and we comply with that law and the regulation of the Information Commissioner. We have to conform to other legal and regulatory obligations that includes verifying your identity, the source of your funds and wealth, recording telephone calls, retaining correspondence and other printed materials, responding to information requests from government and regulators, and employing legal, accountancy and compliance professionals. Such supervision may involve disclosure of some information we hold about you to those agencies and persons. This is an obligation placed on all providers of financial services and your consent is not required.

Is my Data disclosed?

The most common disclosure of information is to the providers of financial products we have recommended and you have decided to deal with. We only disclose the minimum data necessary for you to establish the relationship. It is common to have to enter data into providers' systems and third party

research, analysis and quotation systems to generate the advice before we have provided the advice to you.

How do we store your Data?

Your information is stored in the form it is collected; in typed and written notes, forms, and the papers you and others provide to us. These will be scanned and stored on a server in a secure location. Original papers are catalogued, filed and subsequently archived and placed in a secure depository.

Certain information is entered in our customer relationship management database that includes your contact details, date of birth, contacts with other clients, National Insurance number, risk profile and other markers we use for the efficient administration of our services. Full details of all the products we recommend and arrange are also held.

How do we protect your Data?

We treat the security of your data very seriously. We keep information physically secure and password protected. Your information is held on a server in a secure location protected by a monitored firewall. Some of your information is entered into online systems that perform certain functions necessary for financial and investment planning. We can supply details of the software applications we use and the access, disclosure and other details of each.

What is Special Category Data?

Certain information is deemed to be sensitive and has greater legal safeguards. The special category data we may ask for and hold about you could be general or specific health details. When providing financial planning services we need to know if you are in good health or not. When arranging pension annuities, and life and disability policies we shall have to ask more detailed health questions. We do not store sensitive data in database fields. Such information will however be contained in the digitised and stored documents. We need your consent to hold this data.

YOUR RIGHTS

We will supply a copy of our Privacy Policy on request. You have the right to request access to, or for a copy of, the personal information we hold about you, free of charge in most cases, and for the correction of data when incorrect, out of date or incomplete. You have the right to request that we stop any consent-based processing of your personal data after you withdraw that consent.

You should write, telephone or email to
Compliance and Oversight Officer, Bottriell Adams LLP
Gaunts Business Centre, Petersham Lane
Wimborne Minster BH21 7HP
01202 848080
mail@bottrielladams.co.uk

CLIENT CONSENT

I/We consent to Bottriell Adams holding and processing data about my health as are necessary for the provision of the services to be provided under the services and costs agreement.

Signed

Name/s

Date