



## **PRIVACY NOTICE**

AdviserBook Ltd (known as AdviserBook, sometimes referred to in this notice as “we”), registered in England and Wales at 12 Waterside Court, Albany Street, Newport, United Kingdom, NP20 5NT (No. 10721559) is committed to protecting the privacy and security of personal information.

The purpose of this privacy notice is to notify you (the firm) of how we collect and use personal information, in accordance with the EU General Data Protection Regulation (**GDPR**). AdviserBook is a "data controller". This means that we are responsible for deciding how we hold and use personal information.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information, so that you are aware of how and why we are using such information. We may update this notice at any time.

It is your responsibility to notify any individual whose personal information you have added onto AdviserBook about this privacy notice and ensure they fully understand how we hold and use personal information.

The only personal information we possess is personal information which has been voluntarily supplied by you. You must therefore gain the appropriate consent from any individual whose personal information you have added onto AdviserBook.

By agreeing to this Privacy Notice, you are confirming that you possess the appropriate consent from all individuals whose personal information you have added onto AdviserBook.

### **What information do we hold?**

Personal information means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

Unless otherwise agreed, we will only collect basic personal data which does not include any special categories of personal information (often known as “sensitive personal data”). Personal data can include FCA reference number, title, first name, surname, gender, qualifications, email address, telephone number, Twitter account, LinkedIn account and personal biography.

### **How do we collect personal information?**

We collect personal information such as FCA reference number, first name and surname from the Financial Conduct Authority's Financial Services Register. All other information regarding personal information is supplied voluntarily by you with the appropriate consent from the individual.

### **Why do we need personal data and what do we do with it?**

We need to know basic personal data in order to include individuals on our directory of financial advisers which we display to users of our website. You can view our website at <https://adviserbook.co.uk>. Without this information we will be unable to include individuals on our directory. We will not collect any personal data that we do not need in order to provide our directory service.

We take reasonable steps to ensure that personal data is processed securely.

If you wish to include an individual's personal information on our directory, you must gain the appropriate consent. Once you enter an individual's personal information, we will proceed with processing the information provided by you and include this on our directory.

You have the right to withdraw an individual's personal information at any time by either removing their profile or notifying us by phone or email.

### **Change of purpose**

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **DATA SHARING**

We may have to share data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

### **Why might you share my personal information with third parties?**

We will share personal information on our directory accessible by the public via a subscription, or with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. On request we will provide you with a list of our third-party service providers.

All the personal data we hold will be processed by our staff in the United Kingdom. We also engage the services of third parties including but not limited to Mandrill and Google Maps whose servers are located within both the United States and the European Union. No other

third parties will have access to personal data unless you have provided additional consent for us to share personal data or there is a legal obligation for us to provide them with this.

### **How secure is my information with third-party service providers?**

All our third-party service providers are required to take appropriate security measures to protect personal information in line with our policies. We do not allow our third-party service providers to use personal data for their own purposes. We only permit them to process personal data for specified purposes and in accordance with our instructions.

### **What about other third parties?**

We may share personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share personal information with a regulator or to otherwise comply with the law.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **DATA RETENTION**

### **How long will you use my information for?**

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, which will generally be a minimum of 6 years from the conclusion of our services.

If you consent to marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your duty to inform us of changes**

It is important that the personal information we hold is accurate and current. Please keep us informed if any personal information changes.

### **Rights in connection with personal information**

Under certain circumstances, by law an individual has the right to:

- **Request access** to personal information (commonly known as a "data subject access request"). This enables an individual to receive a copy of the personal information we hold and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold. This enables an individual to have any incomplete or inaccurate information we hold corrected.
- **Request erasure** of personal information. This enables an individual to ask us to delete or remove personal information where there is no good reason for us continuing to process it. An individual also has the right to ask us to delete or remove personal information when objection to processing is exercised (see below).
- **Object to processing** of personal information (note that this only provides an individual with the right to raise objections, not a blanket right to have any and all processing cease). An individual also has the right to object where we are processing personal information for direct marketing purposes.
- **Request the restriction of processing** of personal information. This enables an individual to ask us to suspend the processing of personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of personal information to another party.

If an individual wants to review, verify, correct or request erasure of personal information, object to the processing of personal data, or request that we transfer a copy of personal information to another party, please contact Tom Roberts in writing.

### **What we may need from you**

We may need to request specific information from you to help us confirm your credibility and to ensure your right to add and access the information. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where an individual may have provided their consent to the collection, processing and transfer of personal information for a specific purpose, they have the right to withdraw their consent for that specific processing at any time. To withdraw consent, please contact Tom Roberts (see below).

Once we have received notification that consent has been withdrawn, we will no longer process information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **QUESTIONS**

If you have any questions about this privacy notice or how we handle personal information or wish to raise a complaint about how we have handled personal data, please contact Tom Roberts (below) of AdviserBook who will investigate your concerns.

If you are not satisfied with our response, or believe we are processing data unfairly or unlawfully, you can make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact Tom Roberts at [info@adviserbook.co.uk](mailto:info@adviserbook.co.uk).**