

CIRENCESTER FRIENDLY INTERMEDIARY PRIVACY NOTICE

PURPOSE

This privacy notice describes how we collect and use personal information about you when we enter into an agreement with you for intermediary services, in accordance with data protection law, including the General Data Protection Regulation (GDPR).

- Cirencester Friendly is a data controller. This means that we're responsible for deciding how we hold and use personal information about you. We're required under data protection legislation to notify you of the information contained in this privacy notice.
- This notice applies to current and former intermediaries.

This notice can be updated at any time, with the current notice published on our website. It's important that you read this notice, together with any other privacy notice that is provided on specific occasions when we're collecting or processing personal information about you, so that you're aware of how and why we're using such information.

DATA PROTECTION PRINCIPLES

We'll comply with data protection law which says that the personal information we hold must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

This notice explains how we collect, use, share, and protect your personal information, when we enter into an agreement with you for intermediary services. This includes submitting an application, agreeing a contract, submitting a claims request, visiting our website, or any other interaction you have with Cirencester Friendly.

We only collect the personal information needed to provide the service you expect. We'll contact you if we plan to use your personal information for purposes not mentioned in this privacy notice.

THE INFORMATION WE HOLD

In order to manage our working relationship with you we'll need to collect, process and store personal information such as:

- Your identity and contact details such as your name, address, email address, phone number, date of birth.
- FCA individual registration number.
- Passport/driving license details.
- Details of enforcement sanction or disqualification details or similar.
- Your alleged conduct/behaviour if it relates to a complaint.
- Criminal convictions and offences data.
- Marketing and communications data including your preferences in receiving marketing from us and your communication preferences.

HOW WE COLLECT INFORMATION

We may collect, use, and store different kinds of personal information about you, during your or your firm's contractual term with us. This includes:

- Contents of an application form by you or your firm.
- Where you supply us with personal information by other means such as phone call, letter, email, or by contacting us through our Adviser portal/services.
- Visiting, using and registering for our Adviser portal.
- Where you supply us with personal information at events or when you complete any of our surveys.
- Where you submit an application or request information.
- Where you act as our point of contact for your firm.
- We may collect your information from public sources such as social media or the Financial Services Register.
- Subscribe to our newsletters.
- CCTV on our premises.

To ensure that we have accurate and up-to-date information, please notify us if any of the personal details you've provided changes during your relationship with us.

HOW WE USE INFORMATION

We collect, process and store your personal information mainly to manage the contractual relationship between (1) us and your firm, and/or (2) us and you, as well as to monitor firms to ensure they don't lead to legal or regulatory breaches or significantly harm our reputation. For the purposes of managing our contract with you and/or your firm, we'll process your personal information to:

- Check your identity and process and manage your appointment as an intermediary including assessing your suitability.
- Carry out adverse media checks, screening against external databases and sanctions lists and establishing connections to politically exposed persons. This may include information relating to criminal offences obtained from pre-registration screening.
- For the day-to-day management of your role as an intermediary (such as processing your registration, interactions with our regulators; statutory and regulatory filings; providing you with support and communicating with you.
- Monitor and record communications and phone conversations between us and you. We'll only undertake monitoring for preventing and detecting possible criminal activity; to ensure compliance with internal policies; to comply with laws and regulations and to check for viruses or other threats to our IT systems. We'll comply with all laws, regulations and internal policies when doing so. Recordings may be used by us in evidence in the event of a dispute with you or our customer with whom you're associated.
- Provide you with the fees to which you are entitled.
- Create internal reports relating to Adviser sales.
- Investigate any complaints.
- Allow you to take part in any prize draw, competition, or complete a survey.

We will not sell or rent your data to third parties or share your data with third parties for marketing purposes. Where we rely on consent as the lawful basis for sharing your data, we'll notify you and obtain your consent before doing so.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

You're expected to let us know if your information changes as it's important the information we hold on you is accurate. If you fail to provide certain information when requested, or to inform us if anything changes, we may not be able to fully perform the contract we've entered with you, or we could be prevented from complying with our legal obligations.

USE OF COOKIES

To make your visit to our website more attractive and to enable certain functions, we employ the use of cookies, which are small text files stored on your computer, on our pages.

Some cookies are deleted upon exiting the browser, others (persistent cookies) are stored on your computer and enable us to recognise you when you return to our website. For more information please check our cookie policy [here](#).

DATA SECURITY

We've put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We've put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They'll only process your personal information on our instructions.

We've 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're legally required to do so.

DATA RETENTION

We'll only retain your 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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we'll anonymise your personal information so that it can no longer be associated with you, in which case we'll use such information without further notice to you. Once you're no longer an Adviser with the Society we'll retain and securely destroy your personal information in accordance with our policy.

RIGHT OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

It's important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that processing is lawful.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we're relying on a legitimate interest (or those of a third party) and there's something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we're processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email **dpo@cirencester-friendly.co.uk**.

You won't have to pay a fee to access your personal information (or to exercise any of the other rights). However, we're allowed under the law to charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we can refuse to comply with the request in such circumstances.

WHAT WE NEED FROM YOU

We sometimes need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information isn't disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you've provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact **adviserservices@cirencester-friendly.co.uk**. Once we've received notification that you've withdrawn your consent, we'll no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

DATA PROTECTION OFFICER

We've appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact **dpo@cirencester-friendly.co.uk**.

You have the right to make a complaint at any time to the DPO at the above email address or directly to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Web: **www.ico.org.uk/make-a-complaint/**

Telephone: **+44 (0)303 123 1113**

In Writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and you can find our current version on the website.