

# Privacy Notice

This privacy notice explains how we use any personal information we collect about you.

### **What information do we collect about you?**

We collect information about you when you engage us for our financial planning services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We'll use your information collected from the website to personalise your repeat visits to the site

### **Why do we need to collect and use your personal data?**

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we'll obtain your explicit consent in order to collect and process this information.

### **How will we use the information about you?**

We collect information about you in order to provide you with the services for which you engage us.

### **Who might we share your information with?**

If you agree, we may email you about other products or services that we think may be of interest to you. We won't share your information for marketing purposes with other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit. To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

## **Holding your data:**

We undertake to review the data we hold on you on a regular basis to ensure compliance with data protection law. In the course of any review, we will:

- Delete any data which is trivial or transitory in nature, or which in our opinion is no longer required for the purposes set out above.
- Update the data to ensure that any errors or inaccuracies are corrected.
- Archive data as detailed below.
- Subject to the data retention periods, as detailed below, securely delete the data when it is identified that we no longer need to hold it.

We may retain and process your data for the following periods. In the event that more than one period applies to the same data, we will retain the data to the last such period to expire:

- We will hold any agreements between you and us for a period of 6 years from the termination or expiry of the agreement unless we have been notified of any claim or circumstance which might give rise to a claim under or by reference to such agreements.
- We will process data relating to investments which we have provided advice on and / or arranged for you. We will process such data throughout the entire period you are and remain a client of the firm and for a period of not less than 6 years following our ceasing to provide service to you in regard to those investments. In the case of long-term investments we may process your data until the date of maturation of such long-term investments.
- We will hold data as required by any Regulator until the end of any limitation period imposed by that Regulator, which in the case of the Financial Services Authority is currently 6 years for all types of business undertaken except for Occupational Pension Schemes, which can include Defined Benefit Transfers and Scheme Money Purchase Transfers, whereby the data retention period is indefinite.
- We will hold data as required by any relevant third party until the end of any limitation period imposed by that relevant third party, which in the case of HMRC shall be 7 years, unless we are notified that any period is considered "open" by HMRC in which case it will be until we are notified the period is "closed".
- We will hold data as required for the purposes of any legal proceedings for a period of 6 years following the conclusion of any such proceedings unless a longer period is required pursuant to any court rule or enactment. Proceedings will be taken to have concluded on the expiry of any period given for appealing any final judgment or on the date of concluding any settlement staying all relevant claims if the proceedings were settled before judgement.
- Save for the above, we will hold data for a maximum of 50 years from the date we receive the data.

## **How can I access the information you hold about me?**

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

## **Marketing**

We'd like to send you information about our products and services which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email or post - our contact details are displayed at the end of this notice.

## **Cookies**

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

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You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

## **Other websites**

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## **What can you do if you are unhappy with how your personal data is processed?**

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

0303 123 1113 (local rate)

## **Changes to our privacy policy**

We keep our privacy policy under regular review and we'll inform you of any changes when they occur. This privacy policy was last updated on 12th December 2019.

# Questions Or Concerns

If you have a question or concern about any aspect of our services, please contact your adviser at:



[hello@oakfour.co.uk](mailto:hello@oakfour.co.uk)



[www.oakfour.co.uk](http://www.oakfour.co.uk)



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