Customer Privacy Notice

Oliver Financial Planning Ltd takes the privacy of personal data seriously - we therefore ask you to please read the following important information which explains how we collect, store and use your personal data.

Oliver Financial Planning Ltd is registered under the General Data Protection Regulations GPDR 2018.

Who are we?

Oliver Financial Planning Ltd is registered in England under company number 13205258 and office address 30 Circus Mews, Bath, England, BA1 2PW. Our primary business address and correspondence address is 98 Bay Tree Road, Bath, BA1 6NF.

Oliver Financial Planning Ltd is authorised and regulated by the Financial Conduct Authority for the provision of financial advice on investments, pensions, and protection products. You can search for us on the FCA register using our firm reference number, which is 963900.

Under the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR") and the Data Protection Act 2018, we are required to give you certain information about the way your personal information is used.

This notice (together with our Statutory disclosures and any other documents referred to in it) ("Privacy Notice") sets out the basis on how any personal information we collect from you, or that you provide to us, will be processed by us.

Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history **(Your Personal Data).** This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

What do we mean by personal data?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, national insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your Investment or Insurance requirements Your Personal Data may include:

- Title, name, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity.
- Employment and remuneration information , (including salary/bonus schemes/overtime/sick pay/other benefits), employment history.
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents.
- Health status and history, details of treatment and prognosis, medical reports (this is referred to as Special Category Data), further details are provided below specifically with regard to the processing we may undertake in relation to this type of information).

- If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Category Data.
- Any pre-existing investment or insurance products and the terms and conditions relating to these.

The basis upon which our firm will deal with Your Personal Data

When we speak with you about your investment or insurance requirements we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from mortgage lenders, insurance providers and our Compliance Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority (FCA), or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with for example your insurance / ethical investments, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (Your Special Category Data). We will record and use Your Special Category Data in order to make enquiries of insurance / investment providers in relation to insurance products that may meet your needs and to provide you with advice/guidance regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Category Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together “Criminal Disclosures”). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use Special Category Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice. In order to process your Special Category Data however, we do require explicit consent.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to investment and insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Personal Data for example software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

What do we mean by Special Category Data?

Where you ask us to advise or guide you on certain elements such as insurance, ethical investments or retirement income, we may ask you information about your Racial or ethnic origin, Political opinions, Religious or philosophical beliefs, trade union membership, genetic data, biometric data, health & sexual orientation (Your Special Category Data). We will record and use your Special Category Data in order to make enquiries to find suitable products that may meet your aims and objectives and to provide you with advice or guidance regarding the suitability of any product that may be available to you.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This relates to insurance related activities such as underwriting, claims and fraud management.

There are further protections in relation to Criminal Offence data which can be found https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/lawful-basis-for-processing/criminal-offence-data/.

We will use Special Category Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice. In order to process your Special Category Data however, we do require explicit consent.

What happens to Your Personal Data when it is disclosed to us?

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Product Providers and/or Insurance Product providers , both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment or insurance policy you may take out, or to inform you of any developments in relation to those products and/or polices of which we might become aware.

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Investment providers/Insurance providers
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our compliance service provider, product specialists, providers of legal services such as estate planners, (in each case where we believe this to be required due to your particular circumstances).

In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice, i.e. to progress your investment or insurance enquiry and to provide you with our professional services. We will have contracts/safeguards in place to ensure that they comply with the GDPR and treat the privacy of your personal data with the same importance as we do.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area (EEA).

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

Your rights in relation to Your Personal Data

Your enhanced rights under the GDPR include:

- The right of access – we will provide a copy of your personal data within 30 days of requests. Requests can be made in writing, by phone or by email. We will not charge a fee for this unless we think your request is unfounded, excessive or repetitive; in which case we will inform you before proceeding with your request.
- The right to rectification – you may ask us to rectify any of your personal data which you believe is inaccurate or incomplete. We will respond within one month (this can be extended by two months where the request for rectification is complex). Requests can be made in writing, by phone or by email.
- The right to erasure – you have the right to request 'to be forgotten', i.e. for us to delete all records of your personal data. We will comply with your request, unless we have a legal obligation to continue to hold your personal data (in which case we will inform you of the reason why we cannot delete the data).
- The right to request a transfer of personal data – you can ask us to provide you with your personal data to another data controller in a recognised format.
- **Please note; the Legal and Regulatory obligation can, in some circumstances, limit the amount of personal or special category data that can be removed from our records.**

How to make contact with our Firm in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

Tom Oliver by email on tom.ofp@outlook.com, by telephone on 01225 336486 or by writing to Oliver Financial Planning Ltd, 98 Bay Tree Road, Bath BA1 6NF

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time. We will not charge a fee for this unless we think your request is unfounded, excessive or repetitive; in which case we will inform you before proceeding with your request.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at https://ico.org.uk/global/contact-us/ or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Data Subject Consent Form

I hereby grant Oliver Financial Planning Ltd permission to process my personal data for the purpose stated in the Customer Privacy Notice above. I consent to you using this information to obtain relevant investment or insurance solutions that require this in order to enable Oliver Financial Planning Ltd to provide a recommendation to meet my aims and objectives.

In terms of **Special Category Data:** By ticking this box, I/we am/are consenting to the firm obtaining and retaining my/our Special Category Data for the purposes outlined above. ☐

Please tick this box if you give consent for us or any company associated with us to contact you for marketing purposes by e-mail, telephone, post or SMS. ☐

Signed:	Signed:
Print Name:	Print Name:
Date:	Date: