

Online Privacy Statement

Who are we?

We are 360 Financial Services Ltd and appointed representative of New Leaf Distribution Ltd.

360 Financial Services provide financial planning solutions and advice through experienced and qualified advisers based in the UK.

Currently 360 Financial Services and New Leaf Distribution jointly determine the purposes and means of processing personal client data relating to giving advice. This means we are joint data controllers for these core advice giving activities and therefore responsible for managing this client data and ensuring compliance.

However, 360 Financial Services is solely responsible for some activities, for example any direct marketing that we undertake.

What is this privacy statement about?

To supply our customers with our services we need to use information about you, and some of that may be personal or private. For example we may need to know your name and address, details of how you would like to be contacted (e.g. your mobile phone number), or how you would like to pay for the services we provide you.

As we do this, we'd like you to take some time to read this privacy statement. It will explain what information we might collect about you, why we collect it, what we may use it for, and who we may give it to. We'll also explain your rights towards your information and how we look after it while we have it.

What information do we collect about you?

The information we collect about you may vary based on what service we provide to you. Typically, we need details like:

- Your name and address so we know who you are and what services you need from us
- Your contact details like phone number or email so that we can keep in touch with you about our services.
- Your bank account or other financial details so we can manage your payment for our services.

If you are receiving some financial services advice, we will need to know more information about your current position. This might include information regarding:

- Your employment information
- Your assets and liabilities

Some financial services products may require us to collect information about your health and lifestyle.

We only collect information about you that we need to make sure you get the best service from us. We respect your privacy and we try to minimise what we do collect.

How do we collect information about you?

We prefer to collect the information we need directly from you. That way, you know what we have, and we can be sure you've provided us with the most accurate and up to date information.

We will usually do this:

- When you complete our fact find and discussion document.
- When you contact us for any reason.
- If you complete an online form.
- If you interact with us through the client portal.
- If you complete a survey.
- When completing application forms.

What do we do with the information we collect about you?

We use your information in various ways, such as to:

- Meet the purposes that you provided your information for
- Provide you with the services you want
- Let you know about goods or services we feel would be beneficial to you.
- Prevent fraud, money laundering and financial crime
- To confirm your identity.
- Credit scoring and assessment, and credit management (where applicable).
- Keep our records accurate and up to date.
- Comply with any legal or regulatory obligations we may have.

Who do we share your information with?

We appreciate that you have provided your information to us and may not want us to share it with other people or organisations, however sometimes it is necessary for us to do so.

We only share your information where we are permitted or required to by law, or where you have requested us to do so. We may share your information with, for example:

- Any of your family, associates, or someone who represents you, where you have asked us to do so.
- Our employees who provide you with our services.
- Carefully selected organisations and specialists to help us provide you with our services.
- Credit reference and fraud prevention agencies in order to help prevent and detect fraud as part of our due diligence process.
- Any person, organisation or regulator where we are required to because of a court order, regulatory responsibility, legal duty or statutory obligation.

We are careful to minimise such sharing.

Although we are a UK company, we may sometimes share your information with an organisation who is outside the UK. Such companies may also be outside of Europe. We may do this, but we will only do so where we are permitted to by law.

Whenever we share your information we do everything we can to make sure it is protected from misuse or loss.

How do we look after and secure your information

When we use information about you we take all reasonable efforts to do so fairly and lawfully.

We think it likely that our customers know we use information about them, and we provide notices of such wherever we can.

We never use information about you unless it is lawful for us to do so and we have a clearly defined need or purpose.

When we collect information about you we ensure that we minimise what we collect. We try not to keep your information for longer than we need it and we ensure that the records we have about you are managed properly and deleted promptly and securely when we no longer need them.

We make every effort to ensure your rights towards your information, which we detail below.

We take appropriate care to secure the information we hold about you. We have robust technical security such as passwords and information encryption. We also have policies and procedures to ensure your information is only available to our employees who need to see it to do their job, and we train those employees appropriately.

Also, we establish robust procedures and contracts to extend these protections to any other person or organisation we may need to give your information to.

In everything we do with your information we try to be fair, lawful, and open, and we take seriously our obligations towards your privacy and the protection of information we may hold about you.

What are 'Cookies' and how does [AR FIRM] use them?

A cookie is a piece of information that is stored on your computer's hard drive by your Web browser. On visiting the Web Site, your computer server will use the cookie to guarantee a secure connection. Most browsers accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may not be able to use certain features of this Web Site.

Forces Family Finance may conduct analyses of user traffic. These analyses will be performed through the use of IP addresses and cookies which are required to ensure a secure server connection. Forces Family Finance does not use cookies to store any personal data or browsing habits.

Third parties such as advertising agencies and content providers may use cookies on this Web Site to collect personal information about you. Forces Family Finance recommends that you read the privacy statement of any third party before using their web site. Forces Family Finance is not

responsible for the use of such cookies or any other ways in which your personal data may be collected or used by such third parties.

Other information regarding our Website

Certain areas of our websites use a Secure Socket Layer (SSL). A SSL is a security device which ensures that any data which you enter is encrypted during transmission over the internet. Encryption means the data is encoded so that it is not legible until such time as we decode it.

No data transmission over the internet can ever be entirely secure. While we do our best to protect your personal information, we cannot guarantee its security and you must be aware of this when using our websites.

Our websites may contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own Terms & Conditions and privacy policies and that we cannot accept responsibility for their content. This privacy statement applies only to our website.

By email and phone

If you have contacted us by email, or provided an email address, we may use that to contact you if we need to.

You should also be aware that information conveyed by email could be deliberately or accidentally intercepted or corrupted.

Whilst we make every effort to ensure that emails we send to you are free from viruses this cannot be guaranteed. We recommend that you scan all email for viruses with appropriate and frequently updated virus checking software. You should also avoid sending us emails from unsecure or public wi-fi zones (such as coffee shops) to mitigate your messages being intercepted.

Where you are receiving financial advice, we encourage you to use our client portal, which is a secure space to share information and documentation with your financial advisor. A guide to using the client portal is available for download at the bottom of the page.

If you have given us your phone number (landline or mobile), we may use it to contact you if we need to, including sending texts.

Please let us know if your mobile phone number or email address changes so that we can keep this information up to date.

Your rights

GDPR gives you certain rights towards your personal information. We take all reasonable efforts to ensure we allow you to exercise those rights.

You have the right to see all the personal information we hold about you.

We'll handle routine enquiries as part of our usual customer service. If you want to see more of the information that we have about you, you can make a data subject access request.

You can write to our principal at:

Privacy Officer, New Leaf Distribution, 1st Floor Princess Caroline House, 1 High Street, Southend on Sea, Essex, SS1 1JE

To ensure that we only give your information out to you and not someone else, you will need to provide us with two current forms of identification.

Once we receive your written request, any clarifications, identification, we respond as soon as we can within 1 calendar month.

You have the right to stop us causing you 'damage or distress'

Unless you have consented to us using your information, or have a contract with us, or we are acting to comply with a legal obligation or in a life or death situation, you can object to us using your personal information in a way that causes you 'substantial and unwarranted damage or distress'.

Damage means that we will use or have used your information in a way that caused you some loss or harm which we shouldn't have.

Distress means that we will use or have used your information in a way that caused you some upset or anguish which was more than an annoyance.

You can write to us and ask us to stop using your information in that way. We will respond within 21 days.

You have the right to have your information corrected

We take all reasonable steps to ensure that the information we have about you is accurate and up to date.

If you think that what we have is not accurate or up to date, please tell us as soon as possible and we will ensure it is corrected.

You have the right to stop us direct marketing to you

If you have received financial advice from one of our advisers, we would like to keep you notified of products and services that we feel might be beneficial to you as part of our ongoing service to you. This could extend to contacting you in advance of a product deal expiring or to keep in touch for a yearly review.

You have the right to opt out of marketing information and tell us what your communication preferences are by contacting us at the number or address provided below. You may opt out at any time if you don't want to receive any further communications of this nature.

Every time we contact you about such offers we will give you the opportunity not to hear about anymore.

If you don't want to receive such offers at all, please let us know by calling **01277 621180** or;

You can write to us at:

1st Floor, Audit House, 151 High Street, Billericay, Essex, CM12 9AB

Or;

Email us at info@360financialservices.co.uk

Also, we will not send you these offers by phone if you have registered with the Telephone Preference Service or by mail if you have registered with the Mailing Preference Service.

Please note though, that you may still receive non-personalised marketing material through your letterbox.

360 Financial Services, New Leaf Distribution and data protection

The General Data Protection Regulation governs how we may use your personal information. We are registered under the Act and regulated by the Information Commissioner's Office (ICO).

You can find our registration details here:

360 Financial Services Ltd (Registration Number: ZA203124)

New Leaf Distribution Ltd (Registration Number: Z966060)

You can also find a lot more information about this on the ICO Website or by contacting them at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
(Tel: **01625 545 700**)

Changes to this statement

From time to time, we may amend this privacy statement to reflect changes in the law, guidance from the Information Commissioners Office (ICO), our experience of handling your information, or for other legitimate reasons. We will do this by posting the amended privacy statement on our website. We therefore suggest you check our online privacy statement from time to time to make sure you are aware of the latest version.