AVON FINANCIAL ADVISERS LTD

DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

Avon Financial Advisers Ltd collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with data protection regulation and we are responsible as a data controller of that personal data for the purposes of those laws.

When we mention, "we", "us" or "our" we are referring to Avon Financial Advisers Ltd.

Avon Financial Advisers Ltd is a company registered in England and Wales (company number 4355884 whose registered office is at 1 Long Street, Tetbury, Glos, GL8 8AA. Avon Financial Advisers Ltd is authorised and regulated by the Financial Conduct Authority. Avon Financial Advisers Ltd Financial Services Register number is 456955.

We provide you with financial advice and products to meet your financial needs and an ongoing advice/review service.

The personal data we collect and use

In the course of providing our service to you we may collect the following personal data when you provide it to us:

• contact information
• identity information
• financial information
• employment status

We also obtain personal data from other sources in the course of providing our intermediary services. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

• From lenders and/or product providers:
  – product details
• From identification and verification checking agencies:
  Identity information and sanction check information

How we use your personal data

The below table sets out:

• how we use your personal data
• the lawful bases upon which we collect and use your personal data
• who we routinely share your personal data with

<table>
<thead>
<tr>
<th>Rationale/Reason for Processing</th>
<th>Lawful Basis for Processing</th>
<th>Third party recipients linked to that activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>• To provide you with intermediary services</td>
<td>Performance of a contract</td>
<td>Compliance Support Services</td>
</tr>
<tr>
<td>• To apply for decisions in principle for mortgage products and/or quotations for protection and/or general insurance products on your behalf.</td>
<td>Performance of a contract</td>
<td>Lenders and Product Providers</td>
</tr>
<tr>
<td>• To apply for products on your behalf, and to regularly review the products that we have arranged and recommended to you.</td>
<td>Consent</td>
<td>Pension Transfer Specialists Mortgage Specialists</td>
</tr>
</tbody>
</table>

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Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as ‘special categories of data’ and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- health information and lifestyle information when providing intermediary services in relation to a protection insurance product;
- criminal conviction or offence information when providing intermediary services in relation to a general insurance product

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and then have a legitimate business reason to do this, and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Your rights

You have legal rights under data protection regulation in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data

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<table>
<thead>
<tr>
<th>Type of Record</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pension transfers</td>
<td>Indefinitely</td>
</tr>
<tr>
<td>Personal pensions, stakeholder pensions and protection policies</td>
<td>Five years</td>
</tr>
<tr>
<td>Investments, mortgages, general insurance</td>
<td>Three years</td>
</tr>
</tbody>
</table>

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You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

- By phone: 01249-445581
- email: info@avonfinancial.co.uk
- By Post: PO Box 4173, Chippenham, SN15 9JU

**Whether information has to be provided by you, and if so why**

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with intermediary services.

**How long your personal data will be kept**

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

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Data Privacy Notice v1.0 May 2018
To restrict how we use personal data
To object to how we use personal data
To ask us to transfer personal data to another organisation
To object to automated decisions
To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data
You can ask us to confirm whether or not we have and are using your personal data. You can also ask for a copy of your personal data from us and information on how we process it.

To rectify / erase personal data
You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data
You can ask that we restrict use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it; our
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To object to use of personal data
You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data
You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To contest decisions based on automatic decision making
If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

You can contact us for more information
If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use
your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to Avon Financial Advisers Ltd at PO Box 4173, Chippenham, SN15 9JU.
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with data protection regulation (www.ico.org.uk). We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact Avon Financial Advisers Ltd if you have any questions about this privacy notice or the information we hold about you. If you wish to contact Avon Financial Advisers Ltd please write to PO Box 4173, Chippenham, SN15 9JU.

Consent

I/we give our consent for my/our data to be used and stored as detailed in this Data Privacy Notice.

Name: .................................................................

Signed: .................................................................

Date: .................................................................

Name: .................................................................

Signed: .................................................................

Date: .................................................................