



Wealth Managers

Chartered Financial Planners

SDB STRATEGIC PLANNERS LIMITED

WEBSITE PRIVACY POLICY

As at 25 May 2018



SDB STRATEGIC PLANNERS LIMITED WEBSITE PRIVACY POLICY

This Privacy Policy explains how SDB Strategic Planners Limited (SDBSPL) collects, uses, and stores the personal data obtained via www.sdb.co.uk (our 'Website'), and your rights in relation to the personal data we have obtained.

In this Privacy Policy, 'us', 'we' and 'our' refers to SDBSPL.

SDBSPL is the Data Controller of your personal data, and is subject to the EU General Data Protection Regulation (the GDPR). We are registered with the Information Commissioner's Office (ICO) under reference Z6703939 and further details regarding our registration are available at www.ico.org.uk/register. Our Data Protection Officer (DPO) is Jo Watt.

We may amend this Privacy Policy from time to time, to reflect any changes in the way that we process your personal data.

Your Rights

Under the GDPR you have the following rights:

- The right to be informed – of any and all matters pertaining to your data.
- The right of access – to any or all of your data at all times.
- The right of rectification – of any mistakes or inaccuracies.
- The right to erasure – of data we hold on you.
- The right to restrict the processing of your personal data – if for example you have contested the accuracy thereof and while this is being verified by us.
- The right to data portability – to have your data transferred to another firm.
- The right to object – to any aspect of how we use or handle your data.
- The right to not be subject to automated decision making.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

You can find out more about your rights under data protection legislation at www.ico.org.uk.

If you have any questions or complaints relating to this Privacy Policy and/or about how we use your personal data, please contact our DPO using the following:

By post Bryant House, Silverdale Road, Wolstanton, Newcastle-under-Lyme,
Staffordshire, ST5 8BQ

By email jo@sdb.co.uk

By telephone 01782 712233

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner's Office (www.ico.org.uk).

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Information We May Collect When You Visit Our Website

When you complete our Contact Form or send an e-mail to the e-mail address displayed on our Website, we collect your e-mail address and any other information you provide (for example; your name, your address, your telephone number, your signatory information).

Why We Collect Information About You

The primary legal basis for the processing of your data is for the performance of our contract, or to take steps to enter into a contract with you. Without collecting your personal data we would not be able to carry out the services you require from us effectively, nor fulfil our legal and regulatory obligations.

How Will We Use The Information About You?

We collect information about you in order to provide you with the services within our contract, whether it is in place or proposed, and/or to tailor the proposed services we may provide.

For example, if you send an e-mail message to us requesting information about us, we will use your e-mail address and other information you supply to respond to your request.

Who We Might Share Your Information With

We only share your data to the extent it is necessary to carry out our services and to comply with regulations, for example; with third parties who provide professional compliance services, IT services, specific financial software, etc.

Where third parties are involved in processing your data, we will have a contract in place with them to ensure the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data.

We will not pass on your personal information to any third parties for marketing purposes.

How Long We Keep Your Information

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you, whether that is in place or being proposed. However, we are subject to regulatory requirements to retain data for specified minimum periods. In some cases, we are required to keep relevant data indefinitely.

We reserve the right to retain data relating to our relationship with you as a client (past, present or proposed) for longer than the minimum regulatory periods due to the possibility that it may be required to defend a future claim against us. This is for our mutual benefit.

You have the right to request deletion of your personal data. We will comply with this request so far as we are able to do so, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

If you are not a client and never have been, and we are not proposing to provide services to you, we will only hold the data about you for as long as necessary, to fulfil the purposes for which it was collected, or as required by law.

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How We Keep Your Information Secure

Keeping information about you secure is very important to us. We have technological and operational security policies and procedures in place to protect your personally identifiable information from loss, misuse, alteration or unintentional destruction. Our team receives ongoing training to maintain their understanding of the confidentiality of such information.

We take reasonable steps to ensure that other companies with whom we must share your data from time to time operate within the Data Protection Regulations.

We strive to protect your personal information, however, we cannot ensure or warrant the security of any information which you send to us, and you do so at your own risk.

Accessing and Updating Your Personal Information

You have the right to request a copy of any information we hold about you. If you would like a copy of some, or all, of your personal information, please e-mail or write to us using the contact details noted above.

We have an obligation to ensure that your personal information is accurate and up-to-date, so it is important you contact us immediately if you believe any information we hold may be incorrect.

Children

We understand the importance of protecting the privacy of children, especially in an online environment. Our services and website are not designed for, or directed at, children intentionally. It is our policy to never knowingly collect or maintain information about children, other than where that information is provided by their parents or guardians and it is required in order to fulfil our contract to provide services.

Our Website

When you use our Website and make use of any services we offer via our Website, you are agreeing to the terms of this Policy insofar as it relates to the information we may collect about you through our Website.

Please note, this Privacy Policy does not apply to other websites linked through our Website. Personal information which you choose to provide to other websites will be subject to the Privacy Policies of those websites.

We may collect information about you when you use our Website, including storing your IP address and by using cookies. Cookies are text files containing small amounts of information which are downloaded on your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Persistent cookies remain on a user's device for the period of time specified in the cookie. They are activated each time the user visits the website that created that particular cookie.

Session cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

You can find more information about cookies at www.allaboutcookies.org and www.youronlinechoices.eu.

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A list of all the cookies used on our Website by category is set out below.

- **Strictly necessary cookies:** These cookies enable services you have specifically asked for. These cookies are essential in order to enable you to move around our Website and use its features, such as accessing secure areas of our Website.
- **Performance cookies:** These cookies collect anonymous information on the pages visited. By using our Website, you agree that we can place these types of cookies on your device. These cookies collect information about how visitors use our Website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the Website works.
- **Functionality cookies:** These cookies remember choices you make to improve your experience. By using our Website, you agree that we can place these types of cookies on your device. These cookies allow our Website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

You can set your browser to not accept cookies and the above websites tell you how to opt out of cookies and remove cookies from your browser. Please note, however, if cookies are disabled, some of our Website features may not function.

Location Of Your Data

The information you provide to us may be transferred to countries outside of the European Union ('EU'). For example, this may happen if any of our servers are from time to time located in a country outside of the EU and/or one of our service providers is in a country outside of the EU. These countries may not have the same data protection laws as those which apply in the UK. If we transfer your information outside of the EU in this way, we will take steps to ensure your rights continue to be protected as outlined in this Privacy Policy.