



PRIVACY POLICY – 1 MAY 2018.

Privacy Policy

Mike Oliver Associates is a registered Financial Adviser (FCA No 646955) and our registered office address is Spencer House, Mill Green Business Estate, Haywards Heath RH16 1XQ. Our contact number is 01444 449222.

Why you, our client, should read this policy

We take the privacy of our clients very seriously. Please read this privacy policy (**Policy**) carefully as it contains important information about how your personal data will be used.

For the purposes of the General Data Protection Regulation and all other relevant legislation, Mike Oliver Associates (**'we' or 'us'**) is the 'data controller' (i.e. the company who is responsible for, and controls the processing of, your personal data).

Personal data we may collect about you

Information that you provide

Personal information about you will be obtained, whenever you make an appointment with us, complete forms or ask us to complete transactions for you. We will only collect basic personal data from you, such as your name, email address, phone number, physical address, any necessary financial information and employment details. This is not an exhaustive list. We will not collect any personal data from you that we do not need.

The processing of your personal data will only be done when it is necessary for the performance of a contract with you, or where it is necessary in order to take steps to enter into a contract. It will only be processed for compliance with a legal obligation either with ourselves or with a third party. It can also

be processed if it is necessary for the purposes of legitimate interests pursued by ourselves or a third party.

We will also obtain personal information you provide when you send us feedback, contact us for any reason and by any medium, sign up to a service or share information.

We may ask you to provide sensitive personal data from time to time. If such data is requested, you will be given additional information as to why the sensitive personal data is being requested, and how it will be used.

We may retain a record of any contact you make with us.

Personal Information about other individuals

If you give us information on behalf of someone else, you do confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf any data protection notices;
- give consent to any transfer of his/her data;

Information from third parties

Occasionally we may receive information about you from other sources which will be added to the information already held about you in order for us to help supply our services and products to you.

How your personal data will be used

We will use your personal data for the following purposes:

- to help identify you and any business that you conduct with us;
- administration; and information necessary to conduct your preferred business with us;
- research, statistical analysis and risk analysis;
- client profiling to ensure that we are cognisant of your financial needs;
- Marketing: see “opt out “options below;
- fraud prevention and detection;
- billing and order fulfilment for any business conducted with us;
- share with our providers where there is a legal obligation to do so;

What is our lawful basis or ground for using your personal data?

Under laws that are designed to protect your personal data, we need to have "a lawful basis or ground" each time we use, share or otherwise process your personal data.

By reading and agreeing to this Privacy Policy, you are consenting to us processing your personal data as detailed within this Privacy Policy.

We may also need to process your personal data to comply with any legal obligations which may be applicable. Likewise, we may process your personal data where this is in the public interest or it is to protect your vital interests, but this will only be in rare circumstances.

In most cases, our processing of your personal data is necessary for the performance of our services to you.

Certain uses of your personal data, or other processing activities, may not be strictly necessary to perform our services to you, however, they may be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say, "legitimate interests", we mean our (or a third party's) interests in enabling us to provide our services to you as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure. We will also need to impart your personal data to a third party to be able to process any business with you and to comply with the legal obligations of the third parties/providers that we use. The list of these providers is available on request.

Marketing and opting out

If you have provided your consent to receive news with reference to our services from us, we may contact you by mail, SMS, email, direct mail, text/picture/video about services or information that may be of interest to you.

If you prefer not to receive any further marketing communications from us, you can opt out at any time. See further 'Your rights', below.

Disclosure of your personal data

We may disclose your personal data to:

- other companies whom we conduct business with and who require your data for legitimate reasons;
- a third party who acquires Mike Oliver Associates or acquires substantially all its assets, in which case the personal data shall be one of the acquired assets;
- our service providers;

- law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law;

Keeping your data secure

We will use technical and organisational measures to safeguard your personal data, for example:

- where you create an account on a provider's website, this will be controlled by a password and username that are unique to you;

We will store your personal data on secure servers.

- Data is stored on a RAID 1 Business Class NAS at a secure offsite location;
- Data is backed up using ShadowProtect SPX, and replicated to a secure offsite location;
- Data is protected by complex password in excess of 8 characters and Encrypted at a secure offsite location. Our offsite location uses Enterprise Level security procedures;

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any concerns about your information, please contact us using our contact details at the bottom of this policy.

Monitoring

We may monitor and record communications with you (such as emails) for quality assurance, training and fraud protection and compliance.

Your Rights

- You have the **right of access** to your personal records or other information that we hold about you. There is no administrative charge for this service.
- You have the **right to rectify any errors** in the data we hold about you. If any such data or information held is inaccurate, or out of date, please contact us and we will correct this immediately.
- You have the **right to have the data we hold about you erased**.
- If you wish us to continue to store your information but **wish us to keep your data separate** and not process it in any way, please inform us.
- You have the right to ask us to **stop contacting you for any marketing purposes**.

- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file. There is no administrative charge for this service.

To assert any of your rights set out above, you should send your request in writing to us using our email address: mike@moaifa.co.uk

You will need to provide proof of identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, to be amended or be removed.

How long we will store your data

We will store your data for as long as necessary for processing. Please note that there are FCA regulations in place for the retention of personal data. The data may be deleted in the following circumstances:

- You have withdrawn your consent to data processing;
- The original purpose for processing the data is no longer relevant or cannot be performed any more;
- The data is no longer up to date or accurate;.

Contact details

We welcome your feedback and questions. If you wish to contact us or our Data Protection Officer, please email us at: mike@moaifa.co.uk specifying that the communication is for the Data Protection Officer. You can also write to us @ Mike Oliver Associates, Spencer House, Mill Green Business Estate, Haywards Heath. RH16 1XQ.

Changes to this privacy policy

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

Data Protection Supervisory Authority

The Data Protection Supervisory Authority in the UK is the Information Commissioners Office. Should you have any complaints about the way we handle your data, you may direct them to the ICO. More information on the ICO can be found on their website: <https://ico.org.uk>

Declaration

I have read, understood and acknowledge the Privacy Policy

CLIENT SIGNATURE.....

CLIENT SIGNATURE.....

PRINT NAME.....

PRINT NAME.....

DATE OF SIGNATURE.....

DATE OF SIGNATURE.....

Consent

We provide advice on a wide portfolio of financial products. We believe these are some of the best and most appropriate in the marketplace. We would like to be able to contact you so that we can advise you of new products that might be suited to you. We also may advise you of any developments that might make it appropriate for us, or for third parties, to give you pro-active advice about the investments, insurance and other financial products of which we are aware. We stress that your information would only be used in this way to help us to provide a pro-active service to you.

There may be times when we feel that a service or product may be of interest to you. In order to make you aware of these services or products, we may wish to contact you so that you can make informed choices about your finances.

Please indicate if we can contact you. Please tick either one or both boxes so that we can advise you of products and services from time to time.

- OPT IN Yes, please give me details about products or services which could be of interest to me.
- OPT OUT No, I am NOT happy for you to give me details about products or services which could be of interest to me.

Please indicate your preferred methods of contact, if all methods tick all boxes.

We would like to provide details to you about products or services we think will interest you. Please tick the relevant boxes below to authorise us to contact you via the following methods:

- via telephone
- via post
- via email
- via SMS