

This document relates to the UK General Data Protection Regulation (GDPR) which governs the way organisations should handle and protect your personal data. It explains how we use any personal information about you that we collect and retain as part of the process of providing financial advice.

Atkins Bland will be known as the "Controller" of the personal information you provide to us.

The type of personal information we collect

We collect information about you when you become our client(s), apply to use any of our services or contact us in person, by telephone, by email or by post.

We may also collect information about you during online video meetings. Video meetings may be recorded for security and training purposes. We use video meeting tools which are accessed via IT infrastructure belonging to Atkins Bland Limited to conduct online video meetings.

We ask you for information about your personal and financial affairs, and needs and objectives, in order that we can provide you with the advice you require. Some of this information may be classified as "sensitive" since it relates to your health or other areas classified in this way.

If advice or information on health, life insurance or enhanced annuity contracts is required, we may request medical information including family history. This is known as sensitive or "special category data", in addition we will be required to obtain explicit consent from you to process special category data under condition (a) of Article 9, we will ask for this via a Privacy Policy Consent form.

If we are advising you jointly with someone else (e.g., couples living together, trustees, attorneys), information will be held in a single location (e.g., in a joint fact find) and our communications will be to you jointly and each of you will be

privy to information (including, in the case of couples, financial and sensitive information) about the other.

We operate closed circuit television (CCTV) to provide security for staff, visitors, and property. We may, where appropriate, also process this data for the prevention of crime. We have signs in place at our premises, to notify you that CCTV is in operation.

Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

How we will use your information

We collect information about you to ensure that our advice is suitable for your circumstances, to process your application to use our services, to verify your identity to help prevent money laundering and financial crime. Information will be shared with third parties where this is necessary to enable us to provide our services to you or to allow us to comply with our legal or regulatory obligations. Third parties with whom we will share your information and the reasons for this are as follows:

• Product and service providers

You may ask us to advise you in relation to investments, pensions, tax planning and other such services or you may ask us to set up accounts with service providers on your behalf and provide ongoing servicing and reviews. In such cases, we will share information with service providers in order to provide our services to you.

• The Financial Conduct Authority (FCA) and other regulators

The FCA and other regulatory bodies have a legal right to access the information we hold. We have a legal obligation to disclose information we hold to such bodies. There may also be occasions when those employed by other bodies, such as the FCA, need to look at your personal information and they may need to contact you directly.

How we protect your personal information

We take all reasonable steps to ensure your information is kept safe and private. Information is stored on our own computers and those of any providers with whom you ask us to do business. We back-up our data on a regular basis and take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorised access and disclosure. Back-up computer locations are remote from our premises so that, in the event of catastrophe affecting our offices, the data can be retrieved.

Fraud prevention

We have to verify the identity of anyone who asks us to provide services to help prevent money laundering and financial crime. We do this when you first approach us to provide our services to you and thereafter where we are providing regular advice (such as reviewing a portfolio) where the documents we have on file have expired. A third party provides us with an electronic verification system, which we will use to verify your identity.

Circumstances may arise which warrant the disclosure of more than just your basic contact details to third parties such as fund management, investment administration and life insurance companies, our compliance consultants and our regulators. On these occasions you are aware that sensitive personal information (e.g., health details) held by us may be disclosed on a confidential basis to such companies.

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Marketing and communication

We send you information about our own products and services as well as information about your existing contracts which may be of benefit to you.

We may also send you news and information about the financial markets through our quarterly Economic & Market Commentary overview and, when relevant, through our Topical Commentary supplement.

We will not send you marketing communications unconnected to your financial planning and your details will not be disclosed to any other parties without your consent.

You have the right to stop us from contacting you for marketing purposes at any time.

If you no longer wish to be contacted for marketing purposes, you can inform us using the contact details below.

Your data protection rights

Under the General Data Protection Regulation, you have various rights regarding the use of your personal data which are as follows:

- The right of access to any or all of your data at all times. If you wish to see a list of the personal information we may hold on you, please contact us using the details below.
- The right of rectification of any mistakes or inaccuracies. You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- The right to erasure of data we hold on you. Please note that this right is not absolute. If you require details of when the right to erasure does not apply, please contact us using the details below.
- The right to restrict the processing of your personal data if, for example, you have contested its accuracy and while this is being verified by us.
- The right to object to any aspect of how we use or handle your data.
- The right to data portability, e.g., to have your data transferred to another firm.

Our lawful basis for processing your information

It may be necessary to process information for the performance of a contract (e.g., arranging a policy or an investment) to which you are a party.

We may also have a legal obligation to collect personal information from you (e.g., to verify your identity), to enable us to comply with our anti-money laundering obligations and for the purpose of crime prevention and fraud prevention.

Similarly, we may collect and use your personal information in reliance on our legitimate interests (or those of a third party). A legitimate interest is when we have a business reason to use your information, such as, to enable us to provide you with a service you have requested or complying with legal obligations that apply to us.

Retention of your personal information

The Financial Conduct Authority requires us to keep records of our business transactions for specified periods and as long as it is in your interests that we do so. We will generally keep your

personal information for no less than for the duration of our business relationship with you. After you stop being a customer, we may still keep your personal information, in order to respond to any questions

or complaints or to show that we treated you fairly or because we are obliged to according to legal or regulatory rules that apply to us.

Your data will be updated and amended if necessary at the regular review meetings that you have with your financial adviser and/or if you specifically notify us of any changes to your personal details.

Changes to our Privacy Policy

We keep our privacy policy under regular review. Any substantive changes we make to our privacy policy in future will be placed on our website. This Policy was last updated in September 2022.

How to contact us

Please contact us if you have any questions about our Privacy Policy or information, we hold about you:

Post: Atkins Bland Limited, Consort House, Princes Road, Ferndown, Dorset, BH22 9JG

Email: enquiries@atkinsbland.co.uk

How to contact the Information Commissioner's Office (ICO)

You also have a right to complain directly to the ICO if you think there is a problem with the way we are handling your personal data.

For further information and guidance visit: https://ico.org.uk/concerns

Or by writing to the ICO at: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.