

Privacy Notice – Financial Advisers

This is our Privacy Notice for Financial Advisers who hold an agency agreement with the Society. It is a legal requirement of the General Data Protection Regulation (GDPR) which takes effect from 25 May 2018. It sets out how we collect, use, store and safeguard personal data together with details about our obligations under the GDPR.

We have tried to write this guide in plain English but if you have any questions then please get in touch by telephone, email or post.

We also have a general Privacy Notice for members and prospective members and a specific Privacy Notice for our website which includes details of how we use cookies. You can get copies of these by contacting us.

Our data promise:

- To be open and transparent about the way we use information about you.
- To treat data ethically and look after it securely.
- Never to sell or pass on your data for other organisations to market their products to you.

Healthy Investment

Healthy Investment is the trading name of The Rechabite Friendly Society Limited. We are a mutual friendly society and, as a financial services provider we are authorised by the Prudential Regulation Authority (PRA) and authorised and regulated by the Financial Conduct Authority (FCA).

You can contact our Data Protection Officer:

By post: 2 The Old Court House, Tenterden Street, Bury BL9 0AL

By email: data@healthyinvestment.co.uk

By telephone: 0161 762 5790

Online: www.healthyinvestment.co.uk

Healthy Investment is, for purposes of GDPR, a Data Controller.

Personal data and financial advisers

Personal data is information about you. It includes information that is capable of identifying an individual and includes but is not limited to:

- Name.
- Contact details including address, telephone numbers and email addresses, date of birth and National Insurance Number.

- The network or firm you currently or have previously worked for.
- Your views and opinions on our products and service.
- Details of adviser remuneration and commission payments made to you.
- Recordings of telephone calls.

In addition we will collect and use personal data relating to members and prospective members you have referred to us. Our use of this information is detailed in our general Privacy Notice.

You must ensure that you have permission to collect and pass on to us the personal data of clients. We will rely on you to ensure that you have a lawful basis for providing this information and have obtained consent from the client to do so.

As an FCA authorised financial adviser we will continue to share information with you about the performance of client's investments until the client instructs us not to or you cease to be FCA authorised.

How do we collect this information?

Most of the personal data we hold will have been provided by you when you complete an Agency Agreement, when you write to, telephone or email us or when you register on our website.

We may refer to the FCA register of authorised advisers or collect information published online by you or by third parties.

If you use our website we automatically collect details of how you access the site and which pages you have visited. You can find out more about website data from our website Privacy Notice which is available at: www.healthyinvestment.co.uk/privacy-notices or you can contact us for a copy.

Accuracy of the information we hold

It's really important to us that the information we hold is accurate and up to date. If any of your personal details such as your name, address or firm or network details change, please let us know as soon as possible. This helps to ensure that we can provide you with the highest level of service possible and that we don't send correspondence regarding your clients to an old address.

If you believe that any information we hold is incorrect or incomplete then please get in touch with us and we will correct it promptly.

Why do we need your personal information and how do we use it?

We need your personal data in order to set up and manage the Agency Agreement.

We need to provide you with initial and ongoing information and training on the investment products we provide.

We need to send you information on our investment funds, their asset allocation and performance.

The legal basis for holding your details is for the performance of the Agency Agreement you have with us. If you do not provide the information we need in order to set up and manage the Agency Agreement we may not be able to enter into or continue the intermediary relationship.

We record telephone calls so that we can reduce the need for written confirmation of instructions, to monitor the way our staff deal with advisers and members and to help train our staff to provide you with the best possible service.

We use the views and opinions you share with us to help improve our products and service.

We need some data in order to comply with the rules of the PRA and FCA.

The data we collect automatically when you use our website helps to analysis its use, improve the website and make it more accessible.

If in the future we intend to collect or process your personal data for a purpose other than that for which it was collected then we will provide you with relevant information.

How we communicate with you

We need to provide you with information regarding the investment products we provide, our investment funds, compliance requirements and other information regarding the Society.

If you have an Agency Agreement with us and you have provided us with your email address we will, wherever we can, send this by email. However you can ask us to send it by post if you prefer simply by contacting us. We do not need your consent to send this information if you have an Agency Agreement.

If you do not have an Agency Agreement with us we have a regular newsletter for members and advisers that we can send by email as well as information on our products, investment funds and other interesting and relevant information. We can only send this by email if you have given us permission (consent).

You can consent to receive the newsletter and other relevant emails, and your personal data may therefore be used only by the Society for marketing purposes, on the Agency Agreement, while using our website, over the telephone, by email or in writing.

You can give this permission and sign up to our newsletter on our website
www.healthyinvestment.co.uk

If you want to change the way we communicate with you or receive our newsletter or give consent to receive information by email, simply email us data@healthyinvestment.co.uk or get in touch by telephone or post.

Who has access to your information?

You have the right to access all the data we hold about you. We explain more about this in the section on access rights.

Our staff may need to access your information in order to manage your agency, provide information on the performance of your clients' investments, deal with your enquiries and make payment of remuneration to you.

We will not pass on your personal information to any other company, organisation or individual for them to market or sell anything to you. We will not sell, trade or rent your personal data to any third parties.

If we are required by law, we may have to pass on information to legal and regulatory authorities including, but not limited to, our Auditors, HMRC, PRA, FCA or for anti-money laundering and fraud prevention to the police.

We may pass on your information to third party service providers for the sole purpose of providing services on behalf of the Society. When we use third parties we only share the information that is necessary and they have to sign a formal Data Sharing Agreement which gives assurance that they will keep it safe and destroy it as soon as they have finished using it.

Will my details ever be transferred outside of the European Economic Area (EEA)?

If you are receiving information regarding your policy or the Society by email, or you have agreed to receive our email newsletter and other marketing emails, then on occasion we use external companies to manage the distribution and sending of these messages.

At present we use Campaign Monitor (Freshview Pty Ltd.) who collect just names and email addresses.

On occasion we use a company called Survey Monkey to undertake surveys on your views and opinions.

Both of these companies are based in the United States so your name and email address may be transferred outside the EEA. We have Data Processing Agreements in place and both companies comply with the EU and US Privacy Shield Framework.

We reserve the right to use other overseas companies to manage the distribution of emails and the collection of your opinions. However we will only do this if we are confident they have appropriate security arrangements in place.

We will not send these companies any other personal data and we will not transfer any personal information to any other company or organisation outside the EEA unless we are compelled to do so by law.

If you use our website you should read our Privacy Notice for website users, which provides full details of how the data collected through it is managed and protected.

If you use our social media sites (Facebook, Twitter and LinkedIn) these companies are based overseas so information you post on these will be transferred outside of the EEA.

How do we keep your data secure?

All of the data we hold we store in the UK.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place physical, electronic and managerial procedures to keep it safe.

Our premises are secure and all data is locked away at night.

We do not store any personal data on laptops or other portable devices.

We use up to date industry standards to keep your personal data as secure as possible against loss, unauthorised disclosure or access.

Our website has an enhanced validation SSL certificate to ensure all data that is submitted online is encrypted during transmission. All data held on the website server is encrypted for additional security.

The Society uses email security software to filter the content of inbound and outbound emails and protect mailboxes from targeted attacks.

The Society's main network servers are backed up daily using encryption software.

The Society is working towards certification by the National Cyber Security Centre.

How long do we keep information about you?

Your personal data will be stored for a reasonable period after your Adviser Agreement ends so that we can fulfil our legal and statutory obligations. After this it will be securely destroyed.

We review our data retention policy on a regular basis so that we do not keep it longer than necessary.

Information collected automatically when you use our website will only be stored as long as we need it.

Your right to access and amend your data.

You, as the data subject, have a number of rights under the GDPR.

Right to access

You have a right to access the personal data that the Society holds about you. This is known as a 'subject access request'. We shall respond promptly, and within one month of receiving the request and all the necessary information from you. Our formal response to you shall include details of the personal data we hold about you, including:

- Where we have acquired the information.
- Why we are holding the information.
- Details of anyone we have shared the information with.

Right to rectification (correction)

You have the right to have any personal data we hold corrected if it is inaccurate or incomplete. We will respond within one month of receiving a request for your personal data to be rectified.

Right to erasure

You have the right to request the deletion or removal of your personal data in specific circumstances, subject to legal requirements. We will erase your data without undue delay should we receive a request.

Right to restrict processing

In certain circumstances you have the right to ask us to restrict how we use your data.

Right to data portability

You have the right to ask for your personal data from us so that you can move, copy or transfer the data to another controller. We will provide your data in a structured, commonly used and machine readable format in a safe and secure way, without hindrance to usability.

Right to object

You have the right to object to us processing your personal information where it may cause damage or distress where processing is based on legitimate interests or the performance of a task in the public interest, direct marketing (including profiling) or for purposes of scientific and historic research and statistics.

Automated processing

We do not undertake any processing by automated means, this includes making decisions without any human involvement and evaluating certain things about you, known as 'profiling'.

What happens if we update our Privacy Notice?

If we want to use your personal data in a way that we have not explained in our Privacy Notice we will ask your permission first.

Our Privacy Notice is reviewed regularly to make sure we continue to meet the highest standards or data security and to protect your privacy.

We can, at any time, update, modify or amend this Notice. The latest version is always available on our website or from this office. We suggest that you review this Privacy Notice from time to time to ensure you are aware of any changes we may have made, however if we were making a significant change to how we use information you have already given to us we would seek your agreement first.

What to do if you have a complaint?

We will take any concerns you have very seriously, but if, after we have tried to resolve your complaint, you remain dissatisfied you have the right to refer us to the Information Commissioner's Office (ICO). You can do this if you believe we have misused or not kept your data secure or if you believe that we have not complied with the requirements of the GDPR. You can contact the ICO on 01625 545745 or 0303 123 1113 or write to Customer Contact, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

How to contact us

If you have any questions which are not answered by this Privacy Notice, or you have any concerns about how we have or could use the personal data we hold, then please get in touch:

By post: 2 The Old Court House, Tenterden Street, Bury BL9 0AL

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Authorised by the Prudential Regulation Authority and Regulated by the Financial Services Authority and the Prudential Regulation Authority.
Financial Services Register 109994.