

## **Privacy Policy**

At Sheraton Financial Planning, we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who visit our website or seek our services, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [jason@sheratonfp.co.uk](mailto:jason@sheratonfp.co.uk) or by writing to Jason Eldrid, Sheraton Financial Planning Ltd, Bridge Street, Wickham, Hants PO17 5JE. Alternatively, you can telephone 01329 822540.

### **How do we collect information from you?**

We obtain information about you when you use our website, and if you seek our advice or other services.

### **What type of information is collected from you?**

If you are visiting our website the personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when.

If you are seeking advice or other services from us we will undertake a getting to know you process. This will include obtaining information about your personal and financial circumstances and objectives. Where you have investments or policies we will obtain information on these either from you or upon consent from you directly from the providers concerned. We will assess your Attitude to Risk and Capacity for loss and record this in our documentation. We will retain records of any investments or policies that you arrange through us.

Where we are providing an ongoing service we will update the information as part of our review process and note our records.

Information may be obtained from you face to face or through e mail or completion of online documentation. As the information is required to enable us to provide our services if you opt not to provide it we may not be able to continue to advise you.

There may be situations where the information we require is a special category of personal data under the legislation. In this case we will explain why we need it and obtain your consent to obtain the data. This situation most commonly occurs where we are arranging life assurance products and need to obtain medical information from you.

## **How is your information used?**

We will use your information to:

- i. Act as the basis for any advice we provide
- ii. to carry out our obligations arising from any contracts entered into by you and us;
- iii. Provide information to investment providers or life assurance firms for the purposes of arranging products and services for you;
- iv. Provide our ongoing service to you.
- v. Meet our regulatory obligations in the services we provide to you.

## **How long is information retained?**

We are required by legislation and the Financial Conduct Authority rules to retain records for specified periods. These vary dependent upon the nature of the service provided. We will not retain information for longer than the period laid down by the FCA.

## **Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

**Third Party Service Providers working on our behalf:** We may pass your information to our third party service providers (including investment houses and life assurance firms), agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf such as paraplanning and compliance support. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the firm for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

## **Contacting you**

We will make appropriate contact with you to provide the agreed services. Where this includes our ongoing service we will contact you at the agreed intervals to undertake our review. We may also contact you in between the agreed intervals if we believe that you need to take action (e.g. if you should consider making ISA or pension contributions before tax year end) or be aware of changes in the economic situation.

We will not contact you for marketing purposes by post, email, phone or text message unless you have given your prior consent. You can change your marketing preferences at any time by contacting us by email: <insert address> or post.

## **Your rights in relation to your information**

The accuracy of your information is important to us. Where we provide just an initial advice service the information will reflect your situation at that time and we will not normally update this (apart from a change of contact information). Where we are providing an ongoing service we will update the information as appropriate when we undertake a review with you. If between reviews you change your contact information please notify us and we will update our records.

Under new EU requirements you have a number of specific rights, these are summarised below:

**Access** – You may ask for a copy of the information <insert firm name> hold about you and we will provide this within one month of receipt free of charge (we may charge a fee for subsequent or duplicate requests).

**Rectification** - You may ask us to correct any information that we hold that is inaccurate or incomplete.

**Erasure** – You may ask us to delete or cease processing data in certain situations. Please note that we will have regulatory obligations to retain information for certain time periods and we will retain such information as we believe is necessary to fulfil these obligations.

**Restrict processing** – You may ask us to cease processing information. This means that we will be able to retain it but no longer act upon it. In the event that you no longer need our services and terminate them we will automatically cease processing information.

**Portability** – You may have the right to have your data transferred to another service provider in an appropriate electronic format. Please note that we will have regulatory obligations to retain copies of the information as outlined previously.

**Objection** – You may have the right to object to us processing information or using it for marketing purposes.

This is a brief summary of your rights and there may be restrictions on some of them. If you wish to explore any of these rights at any time please contact us on the addresses above and we will be pleased to assist you.

## **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it is retained securely and processed in a confidential manner. Your information may be accessed by your adviser and our support staff for the purposes of providing our services to you. In addition, it may be accessed by senior managers and our compliance consultants (or the FCA) for the purposes of ensuring compliance with our regulatory obligations and reviewing the quality of our advice.

Information may be transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information that passes between us, and you should consider the risk of this. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## **Use of 'cookies'**

Like many other websites, the Sheraton Financial Planning website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

## **Profiling**

When you visit our websites we use a cookie to assign you a randomly generated unique identifier. We log your activity on our websites against this identifier in our databases. Once in our databases, this information will be added to your user profile and we use this data to monitor your activity on our website.

## **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## **Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

## **Right to complain**

If you believe that we are not holding your information correctly or are unhappy at any dealings with us regarding your information you may complain to the Information Commissioners Office. You can do this via their website <https://ico.org.uk/concerns> or by calling 0303 123 1113.

## **Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in January 2018.

## **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at [advice@sheratonfp.co.uk](mailto:advice@sheratonfp.co.uk).

Or write to us at:

Sheraton Financial Planning Limited  
Bridge Street  
Wickham  
Hants  
PO17 5JE