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## PRIVACY NOTICE

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### **BACKGROUND:**

Sterling Financial Services understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our Clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### **1. Information About Us**

Sterling Financial Services

18 Station Road

Burgess Hill

West Sussex

RH15 9DQ

01444 871661.

Data Protection Officer: Darren Dix, 18 Station Road, Burgess Hill, West Sussex, RH15 9DQ, 01444 871661.

We are authorised and regulated by the Financial Conduct Authority. Our Financial Services Register number is 409749.

#### **2. What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### **3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- Income and Expenditure;
- Assets and Liabilities;
- Investment, pension and life products you may have;
- Information about your preferences and interests;
- Martial Status and Dependants
- Any other information gathered from our Fact Find Questionnaire.

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for may be used for one of the following purposes:

- Providing financial and retirement advice.
- Providing taxation advice.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email AND/OR post that you have opted-in

to (you may unsubscribe or opt-out at any time by writing to us via email or by post).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We use the following automated systems for carrying out certain kinds of decision-making AND profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method, the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 11.

#### **7. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Pension Transfer Advice will be kept indefinitely due to our FCA regulatory requirements.
- Any other advice we provide you will be kept indefinitely due to our FCA regulatory requirements.

#### **8. How and Where Do You Store or Transfer My Personal Data?**

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR. We use Sync.com to store your data electronically.

#### **9. Do You Share My Personal Data?**

We may share your information with third party service providers such as insurance providers, compliance, and other agents relevant to the business activity.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying

with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

We contract with third parties (as described above), and those third parties may sometimes contract with third parties (as described above) that are located outside of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If any personal data is transferred to a third party outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

#### **10. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### **11. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Darren Dix, 18 Station Road, Burgess Hill, West Sussex, RH15 9DQ, 01444 871661.

#### **12. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available in writing to you.

**13. Use of data processors**

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. Our Data processors / Third parties that we use include:

- Regulatory and Compliance opinion where required: Millen & Millen
- Back Office Systems: Intelliflo
- Research Software Tools: IRESS and Trigold

**CONSENT for Sterling Financial Services to hold, store and process your Personal Data**

Information supplied may be stored on computer or paper records and may be used for Regulatory, record-keeping, contact and marketing purposes by Sterling Financial Services. Details may be passed to our Regulatory Authorities & Auditors for the purpose of compliance. We will NOT pass on your data to third parties for any marketing purposes.

Do you consent to this?	YES/NO	Do you consent to this?	YES/NO
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Client Name		Client Name	
Client Signature		Client Signature	
Date		Date	

**CONSENT for Sterling Financial Services to contact you**

We wish to gain your agreement, so we may contact you at any point in the future (including by telephone & email) for ongoing services & marketing purposes – for example, with valuations, details of products, services or promotions we think you might be interested in.

Do you consent to this?	YES/NO	Do you consent to this?	YES/NO
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Client Name		Client Name	
Client Signature		Client Signature	
Date		Date	

(\*N.B. If a client does not wish for their data to be stored on computer records, we may be unable to act for them.)

**WITHDRAWAL OF CONSENT**

If at any time you wish us – or any company associated with us – to cease obtaining, using, processing and disclosing personal data about you (including contacting you for marketing purposes), please contact us to withdraw your consent:

in writing, by Phone or Email to: Darren Dix, 18 Station Road, Burgess Hill, West Sussex, RH15 9DQ, 01444 871661, darren@sterlingsfs.org.

Subject to certain exceptions, you are entitled to have access to your personal data held by us.