

PRIVACY POLICY

The General Data Protection Regulations introduced a variety of Data Protection changes from the 25th May 2018. The following statement is the Brilliance Financial Services Limited Data Protection Privacy Policy & and Cookie Policy. Thank you for taking the time to visit our website. Brilliance Financial Services Limited respects each person's privacy and this policy will advise you how we collect and use the personal information that you supply us with. By submitting your data to us, it is implied that you have given us your permission to use your data under the terms of this policy. Our Privacy Policy is updated from time to time, so please check our website regularly to ensure you are fully up-to-date with how we deal with the information you have provided to us.

Who we are: Brilliance Financial Services is a Limited Company registered in England & Wales (registration number 06552147) whose registered address is c/o Andrew Miller & Co Accountancy, Stratton Cleave, Cheltenham Road, Cirencester, Gloucestershire, GL7 2JD. We provide financial planning services and wealth management services.

Why we need your details: Brilliance Financial Services collects and uses your personal details and details about your personal and financial circumstances, which can include telephone numbers, address and e-mail, so that we can process one of the following:

- Provide you with financial advice or service
- Reply to any requests for information that you ask us for
- Clarify any particular query
- Supply details of any product or service within the Brilliance Financial Services Limited group only that we believe may meet your needs
- Cross check any information that we receive with that held on our database.

How we receive the information: The information that we hold may be supplied by you directly to us by telephone, face to face meeting, e-mail or by completed forms in order for us to carry out work for you. We class this as being 'personally identifiable information', which means it can be used to identify you, personally. We may additionally collect and process information about you and/or your spouse/family that will enable us to understand your current circumstances in order to advise you properly. When visiting our premises we may collect and store CCTV footage of you for up to 2 weeks. We operate a CCTV system at our Amersham premises for security reasons only and such footage is never shared with any third party unless there is a security breach that requires us to disclose footage to appropriate authorities in order to cooperate with an investigation.

What kind of personal data will you be required to give to us: We will need to be fully aware of your personal and financial circumstances in order to advise you properly and therefore we may ask you for the following

- your name and title, and date of birth
- contact information, including telephone number, postal address and email address
- information relating to your location, preferences and/or interests
- employment and work details, e.g. job title, employer and length of service,
- photographic identification and other proof of ID documents
- in certain circumstances, your and others' signature(s), National Insurance number(s), financial details such as bank account details and details of any relevant sanctions or similar restrictions
- in certain circumstances, data relating to health (including disabilities), ethnicity, race, religious beliefs, trade union membership and other 'special category personal data'
- any other personal data necessary to perform work contracted by you, such as a pension plan reference number assigned to you

Who has access to this information? Your 'personally identifiable information' details will be kept within the Brilliance Financial Services Limited organisation. Your details will not be sold or otherwise disposed of to any third party.

How Secure are your details? When you register your details with us, we will take all reasonable steps to keep these details secure and free from unauthorised access by use of technology and internal systems which will be updated as new technology becomes available and is appropriate to our systems.

Why we may provide your information to Third Parties? To undertake financial planning work for you, execute an instruction from you, or to provide you with a service that we are contracted to provide you, we may be required to contact a third party, such as pension and investment provider, with your personal details. You will be made aware of these instances and will have given us express written consent first to enable us to carry out the work. There are other circumstances that may oblige us to provide your personal details to a third party, such as our requirement to comply with Money Laundering, Terrorist Financing and Transfer of Funds Regulations for the purposes of preventing money laundering or terrorist financing. We may also be obliged to share your data with our Regulator (Financial Conduct Authority) and third parties such as our firm's auditors and/or insurers.

Use of cookies on our website: A cookie is a small text file that is downloaded onto your computer when you visit certain websites and allows a website to recognise a user's computer. Cookies are used to help users navigate websites more efficiently and to perform certain functions, as well as to provide information to the owners of the website.

Third Party Sites: Other third party internet sites that you can link through to from our website will not be covered by our Privacy Policy and Brilliance Financial Services Limited accept no responsibility or liability for any actions that these sites may perform. We advise that **you should check the policy** of each site that you visit.

Removing or changing your information: If you engage us to provide you with a service, we will contact you on a regular basis, at least annually, to ensure your information is up to date. If you wish to change/amend the information that we hold for you at any other time, please contact us. We do not otherwise routinely retain personal information longer than is necessary. If you wish to have your information removed from our database either permanently or temporarily, please contact us. Due to our Regulatory obligations & Legal responsibilities, there may be occasions where we are unable to erase records. We will discuss this with all clients who request any data to be deleted. If you wish to view or have a copy of your personal data that we hold you may request us to provide you access and/or a copy via a commonly used and machine-readable format.

Use and storage of your personal information

When you supply any personal information to Brilliance Financial Services Limited we have legal obligations towards you in the way we use this data. We must collect the information fairly, that is, we must explain how we will use it and tell you if we want to pass the information on to anyone else. Primarily, we use the data to provide financial advice to you and complete transactions on your behalf. We analyse and assess your data for the purposes of regular financial reviews and to maintain our relationship with you.

We will not hold your personal information on our systems longer than is necessary or reasonable, unless we have undertaken to provide you with a regulated service activity for which we are obliged to retain information according to statutory requirements. For instance, if you are given specialist pension advice, the data will be retained indefinitely. If you require details of the statutory retention periods for the differing product types and classes of data please ask us. We will ensure that all personal information supplied is held securely, in accordance with the Data Protection legislation.

Intellectual property

Users of this our website www.brilliancefp.com may not print, download or in any manner copy images or text from the site, except for personal, non-commercial use, without permission from Brilliance Financial Services Limited.

Withdrawal of consent or to make a complaint: Where we process your personal data we do so on the basis that you have provided your consent for us to do so for the purposes set out in this Policy when you submitted your personal data to us. You may withdraw your consent to this processing at any time by contacting us directly. In the unlikely event that you wish to make a complaint you may do so by emailing scott@brilliancefp.com or by writing to us at Brilliance Financial Planning Ltd, The Last House, 81 Stanley Hill Avenue, Amersham, Buckinghamshire HP& 9BA.