

# 365 INVESTMENT MANAGEMENT

## Privacy Policy

365IM is committed to protecting our clients' personal information. Our Privacy Policy contains important information about what personal details we collect, what we do with that information, who we may share it with and why, and our clients' choices and rights when it comes to the personal information they have given us. If we make changes to our Privacy Policy from time to time, such as changes to where our clients' personal data will be processed, we will advise our clients accordingly.

### How to contact us

If clients have any questions about our Privacy Policy or the information we collect or use, please contact;

**Data Protection Officer, 365IM, Taylor House, 39 High Street, Marlow, Bucks, SL7 1AU**

### Information we collect and use includes

- Information about who our clients are e.g. name, date of birth and contact details
- Information connected to our clients' product or service with us e.g. bank account details
- Information about our clients' contact with us e.g. meetings, telephone calls, emails, letters
- Information classified as 'sensitive' personal information e.g. relating to our clients' health, marital or civil partnership status will only be collected and used where it is needed to provide the product or service our clients have requested or to comply with our legal obligations
- Information our clients may provide us about others, e.g. joint applicants or beneficiaries for products they have with us
- Information on children e.g. where a child is named as a beneficiary on the policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender)

### Where we collect our clients' information

- an application form for a product or service
- telephone conversations with us
- emails or letters sent to us
- meetings with one of our financial advisers or members of staff

We may also collect personal information from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like our clients' address) or to give better contact information if we are unable to contact our clients directly.

### What we collect and use our clients' information for

We take our clients' privacy seriously and we will only ever collect and use information which is personal to them where it is necessary, fair and lawful to do so. 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 will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them. We will collect and use our clients' information only where:

- We have been given express consent to send information about products and services offered by other companies associated to 365IM which we believe may be of interest and benefit to our clients
- it is necessary to provide the product or service our clients have requested e.g. if they wish to invest in a pension or savings product, we will require some personal information including name, address, date of birth, bank account details
- it is necessary for us to meet our legal or regulatory obligations e.g. to send our clients their Monthly Statements, advise them about changes to Terms and Conditions or for the detection and prevention of fraud
- it is in the legitimate interests of 365IM to deliver appropriate information and guidance so our clients are aware of the options that will help them get the best outcome from products, investments or services. We need to process information to better understand our clients and their needs so we can send more relevant communications about the products and services they have with us

- it is in the strict legitimate interests of a third party e.g. sharing information with our clients' employer, or adviser for the governance of a pension scheme of which they are members

If clients do not wish us to collect and use personal information, this may mean that we will be unable to provide our products or services.

### Who we may share our clients' information with

We may share information with third parties for the reasons outlined above and these third parties include:

- Nominated advisers or employer
- Companies we have chosen to support us in the delivery of the products and services we offer to our clients e.g. research, back-office providers, execution venues, compliance consultancy or technology companies, or companies who help us in communications, for example an internet service provider
- Our regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), the Information Commissioner's Office for the UK (ICO)
- Law enforcement, credit and identity check agencies for the prevention and detection of crime
- HM Revenue & Customs (HMRC) e.g. for the processing of tax relief on pension payments or the prevention of tax avoidance. **We will never sell our clients' details to someone else.** Whenever we share personal information, we will do so in line with our obligations to keep our clients' information safe and secure.

### Where our clients' information is processed

All information is processed in the UK. If any information is processed outside the UK, we will put in place legal arrangements to ensure an equivalent level of protection as that applicable in the UK. Whenever EU data privacy laws afford better protection, these laws will be observed and will form the basis of our Privacy Policy.

### How we protect our clients' information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our team members also protect sensitive or confidential information when storing or transmitting information electronically and undertake annual training on this. Our security controls are aligned to good practice standards providing a controlled environment that effectively manages risks to the confidentiality, integrity and availability of information.

### How long we keep our clients' information

We will keep personal information only where it is necessary to provide our products or services while our clients are with us. We may also keep information after this period but only where required to meet our legal or regulatory obligations. We are subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business
- Three years for mortgage business
- Indefinitely for pension transfers and opt-outs
- Three years for insurance business

These are minimum periods, during which we have a legal obligation to retain your records.

### Changes to our Privacy Policy

We review our privacy policy on an on-going basis and update our website as well as advise you of any changes when they occur. **This privacy policy was last updated on 04/09/2021.**

### Our clients' individual rights

- **Right to be Informed** - the right to receive clear and easy to understand information on what personal information we have, why and who we share it with, and we do this in our Privacy Policy and periodic Privacy Notices.
- **Right of Access** - the right of access to personal information. If our clients wish to receive a copy of the personal information we hold, they are entitled to make a Data Subject Access Request (DSAR).
- **Right To Request That Personal Information Be Rectified** - if personal information is inaccurate or incomplete, our clients can request that it is corrected.

- **Right To Request Erasure** – our clients can ask for their information to be deleted or removed if there is no compelling reason for 365IM to continue to have it.
- **Right To Restrict Processing** – our clients can ask that we block or suppress the processing of personal information for certain reasons. This means that we are still permitted to keep information but only to ensure we do not use it in the future for those reasons that such information has been restricted.
- **Right To Data Portability** – our clients can ask for a copy of personal information for their own purposes to use across different services. In certain circumstances, our clients may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example, if our clients were moving their pension to another provider.
- **Right To Object** – our clients can object to 365IM processing personal information where this is based on our legitimate interests.

### **How to make a complaint**

We will always strive to collect, use and safeguard our clients' personal information in line with data protection laws. If our clients do not believe we have handled their information as set out in our Privacy Policy, please contact us with a view of 'Making a complaint' and we will do our utmost to make things right. If our clients were still unhappy, they can complain to our Supervisory Authority. Their contact details are:

ICO helpline: 0303 123 1113

ICO website: [www.ico.org.uk](http://www.ico.org.uk)

ICO address: Information Commissioner's Office, Wycliffe House, Water Lane, WILMSLOW, SK9 5AF