

## PRIVACY AND COOKIES POLICY

As the operators of various products, services and websites (together the “**Aspect8 services**”), the website (“[www.aspect8.co.uk](http://www.aspect8.co.uk)”), Aspect8 (hereby referred to as “**We**”, “**Us**”) is committed to protecting and respecting your privacy. This Privacy and Cookies Policy (“**Policy**”) (together with and any other documents referred to therein) sets out the basis on which the personal data collected from you, or that you provide to Us will be processed by Us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“**GDPR**”, from the GDPR implementation date) or, until GDPR implementation date, the Data Protection Act 1998, (collectively the “**Data Protection Laws**”) the Data Controller is Aspect8 Limited.

### YOUR PERSONAL INFORMATION

#### Information we collect from you

We collect and process some or all of the following types of information from you:

- Information that you provide by *filling in forms on the Website or filing in forms as part of the registration process*. This includes information provided at *the time of registering to use the Website, subscribing to our service, or requesting further information or services*. We may also ask you for information when you *enquire about services*.
- Specifically, personal details such as *name, postal address, email address, date of birth, gender, health status, PEP status, salary and other information relating to your assets and liabilities, telephone number or any other information supplied by you in the Service Charter provided to Us by your Adviser as part of the Compliance Services We provide to them*.
- Specifically, personal details such as *name, email address, date of birth or any information input when using the Website, completing our survey forms, using our Services*.
- If you contact Us, We may keep a record of that correspondence.
- We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them.

Details of your access to the Website, including your IP address, information viewed or searched for, page response times, lengths of visit, login information, browser type and version, traffic data, location data, weblogs and other communication data, and the resources that you access, so we may compile statistics relating to your use of the Website.

The provision of your name, address and date of birth, as well as other personal data is required from you to enable Us to fulfil our regulatory and legal obligations. We will inform you at the point of collecting information from you, whether you are required to provide the information to Us.

#### Information We Collect From Other Sources

Where We request information on any existing plans and policies you may currently hold to aid us in research for full financial review We will also obtain personal data from other sources as follows:

- *Financial details on your policy(s) from professional introducers and insurance companies*

## USES MADE OF YOUR INFORMATION

### Lawful basis for processing

We rely on your consent as provided when you sign up to using our Services as the lawful basis on which We collect and use your personal data. Our legitimate interests in this data are to fulfil our contractual obligations to you and to fulfil our legal obligations as authorised and regulated firms.

### Purposes of processing

We use information held about you in the following ways:

- To provide you with our services.
- To ensure that content on the Website is presented in the most effective manner for you and for the device(s) you use to access and view the Website;
- To provide you with information and offers that you request from Us or which We feel may interest you.

To carry out our obligations arising from any contracts entered into between you and Us.

- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

### Marketing

In addition to the above uses We may use your information to notify you about goods or services which may be of interest to you. Where We do this, We will contact you by electronic means (e-mail or SMS) only if you have consented to such communication. If you do not want Us to use your data in this way please either (i) tick the relevant box situated on your service charter on which We collect your data ;

(ii) unsubscribe from our electronic communications using the method indicated in the relevant communication; or (iii) inform Us at any time by contacting Us at the contact details set out below.

## DISCLOSURE OF YOUR INFORMATION

We may disclose your personal data to third parties as follows:

- We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to host our servers).

We may disclose your personal data to any member of our corporate group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (where applicable).

We may also disclose your personal data to third parties:

- in the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if We or substantially all of our assets are acquired by a third party, in which case personal data held by Us about our customers will be one of the transferred assets; or
- if We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our client agreement/service charter; or
- to protect Our rights, property, or safety or that of our affiliated entities and our users and any third party We interact with to provide the Website; or in relation to selected third parties only, only to the extent that you have consented to such selected third parties notifying you about certain goods or services, which may be of interest to you.

Other than as set out above, and save insofar as is necessary in order for Us to carry out our obligations arising from any contracts entered into between you and Us, We will not share your data with third parties unless We have procured your express consent to do so.

## STORING YOUR PERSONAL DATA

### Security

We take appropriate measures to ensure that any personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

### Keeping your personal data up to date

If your personal details change you may update them by accessing this data through the Wealth Platform portal, or by contacting Us using the contact details below. If you have any questions about how We use

data collected which relates to you, please contact Us by *sending a request by email to the contact details below*.

We will endeavour to update your personal data within seven (7) working days of any new or updated personal data being provided to Us, in order to ensure that the personal data We hold about you is as accurate and up to date as possible.

#### How long We keep your personal data

We will hold your personal data relating to occupational pension transfers indefinitely in order to comply with the requirements of Our regulators from time to time.

We will hold personal data (e.g. name, address, date of birth and contact details) in line with our regulatory and legal obligations as set out by our regulator – currently a minimum of 5 years for investment business and indefinitely for occupational pension transfer or opt-out business.

- If you contact Us as a prospective customer using Our e-mail address or via Our Website contact form, requesting general information about our services, We will hold that personal data
- you choose to provide such as your name, address, e-mail address, for 12 months from Our last point of contact.
- Data such as IP addresses, traffic data, location data, weblogs and other communication data will be retained for 12 months.

#### Where we store your personal data

All of the information that We hold about you is stored on our secure servers within the EEA.

If you would like further information please contact US or the Compliance Director at Best Practice IFA Group Limited, of which we are an Appointed Representative (see ‘Contact’ below). We will not otherwise transfer your personal data outside of the United Kingdom OR EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

#### YOUR RIGHTS

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Policy is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations

- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

email, call or write to US or our Compliance Director at Best Practice IFA Group Limited

let Us have enough information to identify you

- let Us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let Us know the information to which your request relates

#### HOW TO COMPLAIN

We hope that We or our Compliance Director can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory

authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

#### CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Policy at any time. Any changes We may make to our Policy in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy policy.

#### INFORMATION ABOUT OUR USE OF COOKIES AND IP ADDRESSES

We may collect information about your mobile phone, computer or other device from which you access the Website including where available your IP address, operating system and browser type, for systems administration and to report aggregate information to third parties affiliates. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may, however, use such information in conjunction with the data We have about you in order to track your usage of our services.

Our Website uses cookies to distinguish you from other users of our Website. This helps Us to provide you with a good experience when you browse our Website and also allows Us to improve the Website. By using our Website you agree to our use of cookies as more specifically set out below.

A cookie is a small file of letters and numbers that We store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies We use include:

- **“Analytical”** cookies. They allow Us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps Us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- **“Strictly necessary”** cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
- **“Functionality”** cookies. These are used to recognise you when you return to our Website. This enables Us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **“Targeting”** cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed to our affiliates websites. We will use this information to make our Website, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
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<b>Cookie</b>	<b>Name</b>	<b>Purpose</b>	<b>Expiry of Cookie and Further Information</b>
<b>visitorDeviceClasses</b>	visitorDeviceClasses	Identifies if the visitor uses a tablet/iPhone/Desktop to display the dedicated layout of the site	<b>N/A</b>
<b>ASP.NET_SessionId</b>	ASP.NET Session cookie	Manage the user’s session	<b>Session</b>
<b>ANONID_FS{o} - siteId</b>	ANONID FS	ANONID_FS hold only the creation date of the ANONID cookie.	<b>30 minutes</b>
<b>ANONID{o} - siteId</b>	ANONID{o} - siteId	ANONID_FS hold only the creation date of the ANONID cookie.	<b>30 minutes</b>
<b>_utma</b>	_utma	Used by Google Analytics to distinguish users and sessions. Updated every time data is sent to Google Analytics.	<b>2 years from set/update</b>
<b>_utmb and _utmc</b>	_utmb and _utmc	Used by Google Analytics to determine new sessions/visits. Updated every time data is sent to Google Analytics.	<b>30 mins from set/update</b>

<b>__utmt</b>	__utmt	Used by Google Analytics to throttle request rate.	<b>10 minutes</b>
<b>__utmz</b>	<b>__utmz</b>	<b>Used by Google Analytics to store the traffic source or campaign that explains how the user reached your site. Updated every time data is sent to Google Analytics.</b>	<b>6 months from set/update</b>

Please note that third parties affiliates may also use cookies, over which We have no control.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our Website.

#### CONTACT

All questions, comments and requests regarding this Privacy and Cookies Policy should be addressed to [info@aspect8.co.uk](mailto:info@aspect8.co.uk). If you would rather, you can write to us at Aspect8, Holmwood House, Broadlands Business Campus, Langhurst Wood Road, Horsham, West Sussex, RH12 4QP. Or alternatively please contact our Compliance Director at Best Practice IFA Group Ltd, Holmwood House, Broadlands Business Campus, Langhurst Wood Road, Horsham, West Sussex, RH12 4QP, telephone number 01403 334455, or via email at [info@bestpractice.co.uk](mailto:info@bestpractice.co.uk).