

Brighter*

**Data Protection
Guidance Notes**

Brighter Financial Services Limited

www.brighterfs.com

Data Protection Guidance Notes

Introduction

At Brighter we take the security and use of your information for financial arrangements very seriously.

We treat all data that is handled by the practice in respect of your financial arrangements as confidential and have adopted the requirements of the General Data Protection Regulations 2016 into our everyday practice.

1. What information is sensitive?

Within Brighter Financial Services we will treat any information i.e. client's financial history and all personal data including health, cultural and religious beliefs as sensitive. We will also manage any information that you consider to be sensitive within the scope of this guidance.

2. Those taking charge of sensitive information

All those working within Brighter Financial Services Ltd will come into contact with your personal/sensitive data during the course of their duties be they from an advisory perspective or an administrative perspective.

Each person within Brighter Financial Services Ltd has a duty of care to you and mandatory CPD is arranged each year for all employees to complete in relation to GDPR.

As we exercise due care and diligence with client information we would always want to know where there have been errors or where you feel improvements can be made. If you have any reason to suppose that your information has not been handled as sensitively or carefully as you would expect from our practice, we would invite you to e-mail Mary McFadzean mary@brighterfs.com, Business Development and Compliance, outlining your concerns.

We will endeavour to resolve any issues that you raise with us within 5 working days.

3. What can you expect from us?

When handling your personal/sensitive data we will:

- * Keep only that personal and financial information about you to which you have expressly provided consent
- * Use the information that you provide us (only and exclusively) in respect of the management of your financial affairs/products.
- * Not share your personal information with any third parties that do not have a direct interest in the management of your financial affairs/products.
- * Endeavour to hold accurate information about you and request that you support us in maintaining your personal records with information that is current and up to date.
- * Not change the information we hold about you, without your express knowledge and consent.
- * Share your personal information with financial providers of services/third parties in circumstances where:
 - The sharing of the information is in direct relation to the arrangement/management of your financial affairs and with your understanding.
 - The passage of information can be managed securely in terms of digital transfer (encryption, password protect, portal)
 - The passage of information can be managed as securely as possible in terms of paper transfer (see GDPR policy)
- * All the information we hold on our clients is available on –line via our client portal (accessed from the website) or via PFP (our database tool) where clients can see all the information we hold on them. If paper copies are required in addition to this access, we would therefore respectively request a £5 fee for administrative services in the preparation of the paper copy documents.
- * Please note that we are bound by the Regulations of the Financial Conduct Authority. We therefore need to abide by mandatory requirements in relation to the management of your financial affairs. We therefore need to verify your identity in accordance with the Proceeds of Crime Act 2002 and the Money Laundering Regulations 2017. We reserve the right to approach third parties and to delay any of your applications until adequate verification of identity has been obtained.

4. What we need from you

To be able to arrange financial services on your behalf we will need to request both verbal and written information in relation to you and your circumstances. To ensure that you are comfortable with us having access to this information we will ask for your consent on our Terms of Business forms, prior to any products/services being arranged for you.

We would also anticipate that you will help us provide financial services and arrange financial products on your behalf by providing us with personal details as required. If you have any problems in providing us with certain information please speak with your adviser or Nicola Marland the practice administrator (nicola@brighterfs.com)

5. The handling and storage of sensitive data

5.i General security

All sensitive and personal information relating to a client's financial circumstances is stored on our remote access system which ensures the safe storage of client's personal information. The CLOUD stores information away from the adviser's laptop hard drive and so enhances security. Backup of data is further secured with the additional function of virtual multi-site storage. All details are encrypted and password protected. Each adviser and employee of Brighter Financial Services Ltd have use of a single unique password for the systems.

5.ii Hard copy data

Information provided to the financial adviser from the client, which is hard copy and sensitive in nature i.e. driving licences, passports etc will be scanned into the remote storage system (CLOUD) as soon as is reasonably practical. At all other times, when the sensitive information is kept on the premises, it will be stored in a locked cabinet, only accessible by those who are involved in the management and administration of the client's case. The aim will be to return hard copy data to the client within 3 days of it being scanned into the CLOUD. Hard copy data will either be returned personally to the client, or by recorded delivery, Royal Mail.

Any hard copy data removed from the premises as client files are tracked and recorded.

6. Product applications and other information

In all cases, where possible, client records and information will be stored on the CLOUD, not as paper based copy. Where an application for a product needs to be made this will be done on-line, wherever possible, taking advantage of providers security systems. Additional information, sent over the internet will be done via the provider's security system or through encrypted mail, wherever possible.

7. Disposal of hard copy information

All documents, relating to clients, will be returned to them as soon as is reasonably practical.

There are set timescales for the holding and subsequent deletion of client files from our systems. These are as follows:

Pensions and investments:

- * Indefinitely for pension transfers, pension conversion, pension-opt out or FSAVC
- * Six years for a personal pension, stakeholder pension or life policy
- * Six years for a MiFID or equivalent third country business
- * Three years in all other cases.

Mortgages and Protection:

Data stored for the duration that the client is engaged with the practice in arranging and reviewing mortgages and protection.

Ex-clients' data will be archived for 3 years and then deleted after 6 years where there has been no activity from date of archive.

If you have any further questions regarding this policy please contact Mary McFadzean or Nicola Marland at Brighter Financial Services Ltd.(E-mails supplied)