



## **Brighter Financial Services Ltd**

### **Insistent Clients**

#### **What is the definition of business conducted for an “Insistent Client”?**

In the case of clients who, after receiving advice from the financial adviser, choose to follow their own wishes with respect to their financial affairs or where clients, from the outset, have their own objectives in mind, the following process will be executed:

#### **Step 1**

As with all our clients, we will conduct business with you in line with our Terms of Engagement for pensions and investments.

#### **Step 2**

If at any point during the advice process you wish to pursue your own course of action and reject the recommendations of the adviser we would ask that the following takes place:

#### **Actions of client:**

We would request that you put in an e-mail or in writing the following:

- ✿ The reasons you have initially sought advice from the financial adviser
- ✿ What you intend to happen with respect to your financial arrangements.
- ✿ Why you are not in agreement with the recommendations from the financial adviser

**Our contact details, for each adviser, can be found on the website.**

#### **Actions of adviser:**

On receipt of your reasons for rejecting the adviser’s recommendations we will prepare a report for you, outlining the following:

- ✿ Our understanding of the action/approach you wish to take with regards to the arrangement of your financial affairs
- ✿ Any penalties or reduction in future benefits that may occur if you choose not to go ahead with the advised recommendations.
- ✿ That other beneficiaries e.g. dependants may be affected in the future by the decisions taken now.

**Specifically for pensions:**

- ✿ Any taxation that is likely to be incurred if it is a pension draw-down arrangement
- ✿ The sustainability of income
- ✿ Impact on state benefits, including means testing.

We will allow you two working weeks to consider all information presented to you

If after two weeks you wish to proceed on your own terms we will request that you sign a disclaimer and we will set out to you in writing our understanding of the final financial arrangements.

Please note that for our own records we will keep a copy of all correspondence with you and will store a client record for you in our on-line systems.

The adviser is within their rights, as a professional, not to go ahead with a transaction where they consider it to be of detriment to the individual.

**Important notes for clients-our disclaimer**

We are under no Regulatory obligation to process requests on behalf of clients where we consider there to be serious financial implications for either the client or our business. In these cases, we will set out, in writing, our reasons for not processing your financial request.

If you become an “insistent client” please note that you may not benefit from the full protection of Regulation under the FCA or be able to seek recourse through the Financial Services Ombudsman.