



Base Financial is committed to protecting your 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 your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed; we will contact you to let you know.

This version of our Privacy Policy was last updated in May 2018.

How to contact us

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

162 High Street
Tonbridge
Kent
TN9 1BB

Email: info@basefinancial.co.uk

Information we collect and use

Information about you that we collect and use includes:

- Information about who you are e.g. your name, date of birth and contact details
- Information connected to your product or service with us e.g. your bank account details
- Information about your contact with us e.g. meetings, phone calls, emails / letters
- Information that is automatically collected e.g. via cookies when you visit one of our websites
- Information if you visit one of our offices e.g. visual images collected via closed circuit television (CCTV)
- Information classified as 'sensitive' personal information e.g. relating to your health, marital or civil partnership status. This information will only be collected and used where it's needed to provide the product or service you have requested or to comply with our legal obligations
- Information you may provide us about other people e.g. joint applicants or beneficiaries for products you 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)

What are cookies?

A cookie is a small file – it's saved onto your computer or other device when you visit our website. Cookies store small pieces of information. For example - they will remember you've visited our

website or performed a certain action. We use cookies to help us improve your experience when you visit our website. For example, a cookie might store information so you don't have to keep entering it. Cookies also let us know which pages of our website you visited; they help us develop and market our services. Persistent cookies - these stay valid, and will work until their expiry date (unless you delete them before they expire). Session cookies - these expire when you close your web browser.

Where we collect your information

We may collect your personal information directly from you or from a variety of sources, including:

- An application form for a product or service
 - Phone conversations with us
 - Emails or letters you send to us
 - Meetings with one of our financial advisers
 - Registering for one of our events or seminars
- Our online services such as our websites and social media
- One of our professional connections, such as an accountant or solicitor, but only where they have your permission for them to pass us your details

If you are a member of your employer's pension scheme which was set up or is serviced in any way by Base Financial, the information we collect and use will most likely have been provided by your employer on your behalf.

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

What we collect and use your information for

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- You have given us your permission [consent] to send you information about products and services offered by Base Financial and / or selected third parties we have chosen to work with which we believe may be of interest and benefit to you
- It's necessary to provide the product or service you have requested e.g. if you wish to accept our advice in respect of an investment, we will require some personal information including your name, address, date of birth, bank account details
- It's necessary for us to meet our legal or regulatory obligations e.g. to tell you about changes to Terms and Conditions or for the detection and prevention of fraud
- It's in the legitimate interests of Base Financial e.g. to deliver appropriate information and advice so you are aware of the options that will help you get the best outcome from your product or investment; where we need to process your information to better understand you and your needs so we can send you more relevant communications about the products you have with us and to develop new services; where we use artificial intelligence or computer algorithms to improve the services offered to you
- It's in the legitimate interests of a third party e.g. sharing information with your Power of Attorney

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our services.

Who we may share your information with

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for.'

These third parties include:

- Your professional representative (such as an accountant or solicitor) or employer
- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers
- Our regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), the Information Commissioner's Office for the UK (the 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 your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Where your information is processed

The majority of your information is processed in the UK and European Economic Area (EEA).

However, some of your information may be processed by us or the third parties we work with outside of the EEA.

Where your information is being processed outside of the EEA, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

How we protect your 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.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice; providing a controlled environment that effectively manages risks to the confidentiality, integrity and availability of your information.

How long we keep your information

We will keep your personal information only where it is necessary to provide you with our services while you are a client.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how Base Financial uses your information. They are:

- Right to be informed - You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with – we do this in our Privacy Policy and privacy notices.
- Right of access - You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request.
- Right to request that your personal information be rectified - If your personal information is inaccurate or incomplete, you can request that it is corrected.
- Right to request erasure - You can ask for your information to be deleted or removed if there is not a compelling reason for Base Financial to continue to have it.
- Right to restrict processing - You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.
- Right to data portability - You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way.
- Right to object - You can object to Base Financial processing your personal information where: it's based on our legitimate interests; for direct marketing; and if we were using it for scientific/historical research and statistics.

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, contact us and we will do our utmost to make things right.

If you are still unhappy, you can complain to our Supervisory Authority, the Information Commissioner's Office (ICO), <https://ico.org.uk>