

## **WOBURN STREET FINANCIAL PLANNING LTD PRIVACY POLICY**

Woburn Street Financial Planning Ltd is a company registered in England and Wales (collectively referred to as "Woburn Street Financial Planning", "Woburn Street", "we" or "us" in this policy).

### **OVERVIEW**

Maintaining the security of your data is a priority at Woburn Street Financial Planning, and we are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. Woburn Street Financial Planning is also dedicated to being transparent about what data we collect about you and how we use it.

This policy, which applies when you visit our website at <https://woburnstreet.co.uk/>, provides you with information about:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

**More details are below**

## **INTRODUCTION**

Welcome to the Woburn Street Financial Planning Ltd Privacy Policy.

Woburn Street Financial Planning respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit <https://woburnstreet.co.uk/> (the "**Website**") (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Please read this Privacy Policy together with our Terms of Use and Cookie Policy, with care before you use this Website. If you do not accept this Privacy Policy, please do not use this Website.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### **Purpose of this Privacy Policy**

This Privacy Policy aims to give you information on how we collect and process your personal data through your use of and interaction with the Website.

This Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

#### **Controller**

Woburn Street Financial Planning Ltd is the controller (i.e. is responsible for the keeping and use of your personal information) (collectively referred to as "Woburn Street Financial Planning", "Woburn Street", "we", "us" or "our" in this Privacy Policy).

#### **Contact details**

**If you have any questions about this Privacy Policy, please contact us using the details set out below**

#### **Contact details**

Our full details are:

Woburn Street Financial Planning

Email address [hello@woburnst.co.uk](mailto:hello@woburnst.co.uk)

Postal address: The Old Forge, 39A, Woburn Street, Ampthill, Bedfordshire, MK45 2HX

Telephone number: 01525 712 122

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however,

appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 21/04/2021

We'll update this Privacy Policy from time to time to reflect changes in technology, law, our business operations or any other reason we determine is necessary or appropriate. When we make changes, we'll update the date at the top of this section and post it on our Website. If we make material changes to it or the ways we process personal information, we'll notify you (by, for example, prominently posting a notice of the changes on our Website before they take effect or directly sending you a notification by email).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name.
- **Contact Data** includes email addresses, telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.
- **Profile Data** includes your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the Website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with certain services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** The Website includes functions that allow you to give us your Identity and Contact Data by signing up to our newsletter or requesting a call back or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Instruct or are interested in utilising our services;
  - subscribe to our blogs or publications;
  - request marketing information about our services to be sent to you;
  - enter a competition, promotion or complete a survey; or
  - give us some feedback on our services.
- **Automated technologies or interactions.** As you interact with the Website, and this includes when you input data on the 'Advisor Website Index' function we provide, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers such as Google based outside the EU;

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract for services we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(1) Sending you a newsletter via email by using the 'Sign up to our newsletter' function on the Website</p> <p>(2) Providing your name, telephone number and email address in the contact form function on the Website</p> <p>(3) when you contact us via email by clicking on the 'hello@woburnst.co.uk' or 'get in touch' links on the Website</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>Necessary for our legitimate interests (the interests of our business to enable us to communicate with you and provide information concerning the aim of our business and explain the functionality of the Website which we think will be of interest to you). You provide your email address as you expect to receive such communication. Without providing such communications to you being someone interested in our business this will impact on the number of new clients we have.</p> <p>In each instance, the functionality has been included so that you will be unable to provide your personal details until you tick a box that you have read and agree to the Policy.</p> <p>All communications we do send to you are tailored to the content you are interested in and you have the option to 'unsubscribe' if you no longer wish to receive any communications from us.</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests</p>

	(c) Profile (d) Usage (e) Marketing and Communications	(to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant Website content to you and measure or understand the effectiveness of the content we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising the following personal data control mechanisms:

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us by signing up to the newsletter on the Website or have purchased services from us or if you provided us with your details when you completed a survey or registered for marketing and, in each case, you have opted in to receipt of that marketing.

## Opting out

You can ask us to stop sending you marketing messages at any time by checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

<b>External Third Parties</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
(Personal information is stored within an online marketing platform. The core platform is hosted by Microsoft Azure data centres in the EEA)	(a) Identity (b) Contact (c) Profile	Performance of a contract with you  Necessary for our legitimate interests (for running our business, archiving data, provision of administration and IT services, network security, to prevent fraud and data breach.  All personal data is kept within the platform and we have full control of the data within the platform.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (**EEA**).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **8. DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 9. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.