CopperHouse Financial Limited
156 Springfield Road, Chelmsford CM2 6LG
Registered in England. Registered address: Rochester House, 275 Baddow Road, Chelmsford CM2 7QA
Co Reg. No.10956622

Data Protection Policy

Last updated: 15th May 2018

Introduction

The Firm has registered with the Information Commissioner's Office and maintains a current Data Protection license at all times. The Firm agrees to abide by the Principles outlined in the Data Protection Acts and any subsequent legislation.

Due to the nature of our business we may hold substantial information about an individual, their financial situation and additionally we *may* hold sensitive personal data.

We need to keep personal data in respect of our clients whilst we are currently working with them and for a period of three to five years after we have ceased to provide services due to regulatory requirements. In addition we are allowed to keep personal data where it could be significant in the event of future legal action.

Training

Knowledge of the relevant law is essential. The Firm has therefore engaged with a compliance support provider to provide training and updates in connection with data protection developments, industry best practice and legal changes.

The training materials are accessible to any personnel at all times and an annual review of the training is undertaken, plus refresher training is completed by all working in the Firm to ensure current knowledge.

Data security procedures

- The Firm has an IT use policy covering the requirements for secure computer use.
- The Firm's offices are equipped with physical security features and are secured at all times when unattended by authorised personnel.
- The Firm maintains firewall and anti-virus protection on it's electronic systems.
- Data processors are subject of compliance checks by the Firm.

Reporting

The Firm's compliance director will report on any data security breach in line with the requirements of the Information Commissioner.

Specific considerations

Mobile devices

All devices must be password or otherwise protected.

Personal computers and networks

Client data is stored on our computer systems and on our IT provider's system. Physical access to our computer systems is restricted by physical security that is always in place when our premises are unattended. Computer records are further protected by passwords that are changed on a regular basis and not stored on the premises.

Email communications

If we send any personal information to you via email we ensure we only send to the email address/es provided to us by you. When necessary we may also send personal information about you by email to relevant financial product providers. Our systems are protected by anti-virus, anti spyware and firewall protection that is renewed annually and maintained up to date. Personal data via email is minimised and documentation is sent via secure file sharing with password protected links.

On-line content

Where client information is stored online we use password protection and conduct due diligence on the holder of our computer records. Webforms are protected by SSL (Secure Socket Layer which is the standard security technology for establishing an encrypted link between a web server and a browser).

Documents & files

These are held on our secure premises. Visitors do not have access to files that are kept in locked or attended cabinets. We have a clean desk policy to ensure no paperwork is left on view.

Data storage devices

Information kept on storage devices is kept on our secure premises and only transported if it is in the personal custody of an authorised member of the firm. Devices are never carried in hold luggage or in any other circumstances where they would be separated from the individual responsible for safekeeping. Client data is not normally transferred onto such devices. Devices are routinely scanned by IT security software.

Disposal of electronic equipment

Hard drives are securely disposed of after reformatting via a recognised disposal firm and certificates of secure disposal are obtained.

Document disposal

Documents (including written or printed notes containing client information) are securely disposed of via a recognised disposal firm and certificates of secure disposal are obtained.

Telephone conversations

Telephone calls dealing with personal information and financial advice are made in a private environment.

Outsourcing

Where we outsource to other parties and this involves entrusting them with client personal data, we will always ensure that the third party is registered with the ICO and has a data security policy in place.

Third Party Disclosures

We record the people who the client is happy for us to speak with regarding financial matters and ensure that any instructions are repeated back to the client in writing. Where any material information is being imparted we ask two security questions to confirm identity. A list of authorised persons is kept on file where the client is corporate or permits other family members to act on their behalf.

Privacy Policy

Introduction

The Firm believes in protecting the personal information that you provide us with. We are committed to complying with our statement in the following areas:

- What personal information we collect about you
- Who collects you information
- How your information is used
- With whom might the information be shared
- The kind of security procedures that are in place to protect the loss, misuse or alteration of information under the control of the firm.
- How you can correct any inaccuracies in the information

If you have any queries regarding this statement, please do not hesitate to contact us.

Legal basis

We collect, control and process your personal information because this is necessary to provide you with information, answer any queries you may have and for the provision of our services to you. Contractual necessity is therefore the lawful basis for collecting, controlling and processing your personal details (and those of your employees if applicable) other than sensitive personal data for which we require individual consent. We do not normally request or process any sensitive personal data.

Sensitive personal data:

- *Racial or ethnic origin*
- *Political opinions*
- *Religious or philosophical beliefs*
- *Trade union membership*
- *Genetic data*
- *Biometric data*
- *Data concerning health*
- *Data concerning sex life or sexual orientation*

We would discuss with you the need for the provision of sensitive data before you provide this information. The subsequent provision of sensitive personal data will be taken as consent to this processing.

It is entirely up to you as to whether or not you choose to provide us with any personal information. If you choose not to, we simply may not be able to assist you.

What data we collect & what do we do with it

In order to provide financial advisory services we will require personal data about you. This will be stored on our systems.

We periodically check the terms, conditions and privacy policies of our providers, we require standards of security that are compliant with UK data protection regulation.

Sharing your data

In the course of our work with you we may share the personal data that you have provided to us with product and service providers, compliance monitoring support and regulatory bodies where required.

We also use external data processors that will hold information for the following purposes:

- Secure file sharing
- Data backup
- Dissemination of information

Otherwise we will not share your personal information with other companies without your express authority except if the firm is sold or where we are required to do so by law.

We may transfer some data outside the EU. In these circumstances you data may be held in the US. We make sure our processors in these circumstances are signed up t the US-EU Privacy Shield.

Marketing

The information we collect about you is used solely for the purposes for which it was provided. We will never use your data or share it for marketing purposes.

Your rights

Under data protection law you have the right to ask us for a copy of the information we hold about you, and to have any inaccuracies corrected or removed. You may also ask us to delete all personal data held by us or any controller or processor with which we have shared your data. To do this, please either contact us in writing, by telephone or email. Please note that with reference to the introduction on page 1 of this document, there are instances where we would need to retain personal data that you have requested us to delete where there are regulatory requirements for us to do so.

Contact

If for any reason you need to contact us over any aspect of this document please use the following details:

Guy Hammett
156 Springfield Road
Chelmsford
Essex
CM2 6LG

Tel: 01245 603870
Email: admin@copperhousefinancial.co.uk