



Website Privacy Policy

Introduction

This privacy policy sets out how Sound Financial Management Ltd (including its registered Appointed Representatives, such as Parade Financial Services (Devon) Ltd) uses and protects any information that you provide when you use this website.

Sound Financial Management Ltd is committed to safeguarding the privacy of our website visitors and service users, and ensuring your personal data is collected and used appropriately, lawfully and transparently.

This policy applies where we are acting as a Data Controller with respect to the personal data of Sound Financial Management Ltd's website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

Sound Financial Management Ltd will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website, or by using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

In this policy, "**our**" and "**us**" refer to Sound Financial Management Ltd (and its registered Appointed Representatives). For more information about us, see 'Our details' section below.

How we use your personal data

We have set out:

- (a) the general categories of personal data that we may process;
- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and
- (d) the legal bases of the processing.

We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent or our legitimate interests, namely monitoring and improving our website and services.

We may process your account data ("**account data**"). The account data may include your name and email address. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process your personal data that is provided in the course of the use of our services ("**service data**"). The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process information contained in any enquiry you submit to us regarding our services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and recommending services to you. The legal basis for this processing is the performance of a service proposition/agreement between you and us and/or taking steps, at your request, to enter into such a service proposition/agreement and our legitimate interests, namely our interest in the proper administration of our website and business.

We may process information relating to transactions, including our services, which you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is the performance of a service proposition/agreement between you and us and/or taking steps, at your request, to enter into such a service proposition/agreement and our legitimate interests, namely our interest in the proper administration of our website and business.

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or publications ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or publications. The legal basis for this processing is the performance of a service proposition/agreement between you and us and/or taking steps, at your request, to enter into such a contract.

We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Metadata is data about data. In other words, it's information that's used to describe the data that's contained in something like a web page, document or file. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure or to deal with a complaint. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

In addition to the specific purposes for which we may process your personal data previously set out, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

Providing your personal data to others

We may disclose your personal data to any member of our firm insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

We may disclose personal data to our suppliers insofar as reasonably necessary to fulfil a service agreement.

We may disclose your enquiry data to one or more of our selected third-party suppliers of services for the purpose of enabling them to contact you to fulfil a service/s. Each such third party will act as a Data Controller in relation to the enquiry data that we supply to it. Each third-party supplier maintains their own privacy policy.

Our current selection of third-party suppliers in relation to our website are:

- Google Analytics who evaluates your use of the website and compile reports for us on activity on the site
- MailChimp who we use to send communications with news about our products, services and events
- Intelliflo who provides us with and manages our secure database
- Amazon Web Services who we use to store our documentation and communications
- Goldmine Media who manages this website
- Our website also contains links to our firm's Facebook, LinkedIn and Twitter profiles

Our website may link through to third-party websites over which we have no control. We recommend that you check the relevant third party's privacy policy for information about how they may handle your data. We cannot be responsible or liable for any direct or indirect loss however caused by your use of these linked sites.

In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure, or to deal with a complaint.

Retaining and deleting personal data

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained.

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Amendments

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy by email.

Your rights

In this section, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;

- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data has been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims (potential or actual) or to deal with a complaint.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims (potential or actual); to deal with a complaint; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims or to deal with a complaint.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Your right to access

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address);
- (b) we may withhold personal information that you request to the extent permitted by law;

- (c) you may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually expressly agree in advance to our use of your personal information for marketing purposes and we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us or by email to info@sound-financial.co.uk.

About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

10.1 We use cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website;
- (b) status - we use cookies to help us to determine if you are logged into our website;
- (c) personalisation - we use cookies to store information about your preferences and to personalise the website for you;
- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (e) advertising - we use cookies to help us to display products or services that will be relevant to you;
- (f) analysis - we use cookies to help us to analyse the use and performance of our website and services;
- (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

For more details, read our Cookies Policy: <https://www.sound-financial.co.uk/cookie.html>

Our details

This website is owned by Sound Financial Management Ltd.

We are registered in England and Wales under registration no. 3857961, and our registered office is at 5 Windsor Villas, Lockyer Street, Plymouth, Devon PL1 2QD.

Our principal place of business is at 5 Windsor Villas, Lockyer Street, Plymouth, Devon PL1 2QD.

You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

Data protection officer

Our data protection officer's contact details are: Data Protection Officer, Sound Financial Management Ltd, 5 Windsor Villas, Lockyer Street, Plymouth, Devon PL1 2QD. 01752 207070; Info@sound-financial.co.uk.