

## BRIGHTER PRIVACY POLICY

Brighter Financial Services Ltd. takes your privacy seriously. This Privacy Policy explains the data we collect from you, why we collect it and also explains how we use that information, the conditions under which we may disclose information to others and how we keep your personal information safe.

Please read this carefully before you provide us with any information about you or any other person.

Brighter Financial Services Ltd. has its registered office at Brighter Financial Services Ltd. 66-68 West Street, Sowerby Bridge, West Yorkshire, HX6 3AN. For the purpose of the Data Protection Act 1998 the data controller is: John Jackson

When using the term “personal data” in our Privacy Policy, we refer to information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

Any questions regarding our privacy policy should be sent to:

Data Protection Officer, Brighter Financial Services Ltd. 66-68 West Street, Sowerby Bridge, West Yorkshire, HX6 3AN

You can also send questions by email to: [mary@brighterfs.com](mailto:mary@brighterfs.com) or [nicola@brighterfs.com](mailto:nicola@brighterfs.com)

### Who are we?

The Brighter Financial Services Ltd. specialises in a full range of financial planning services. The list of our services is as follows:



Financial Planning for all personal and business needs -including pensions, investments, IHT, tax efficient saving and Trusts advice



Later Years services-retirement advice, wills and LPA's



Mortgages and Protection

### How we collect information from you

We collect information about you when you use our website 'contact' form to enquire about products and services, or when you meet with or contact a Brighter Financial Services Ltd member of staff via email or phone.

## What type of information is collected?

The personal information we collect might include your name, address and email address, and information about your health, lifestyle and finances to provide you the most appropriate financial advice.

We may also ask you to verify your identity by asking for a copy of your passport, driving licence, and proof of residence or income. We are required to ask for this information to comply with legislation such as money laundering regulations and the Financial Services Act.

If we carry out the following services for you we will ask for wage slips and/or bank statements:



Mortgages



Pension draw-down

## Cookies

The Brighter Financial Services Ltd. website uses cookies. Cookies are small files that are stored on your computer's hard drive through your web browser. This is to help us monitor how visitors use our site and allow us to provide you with better services. The website does not store or capture personal information about you when you visit it, it merely records traffic information. This means information about all of our visitors collectively, for example the number of visits the website receives. In order to respect our visitors' rights of privacy, this information is anonymous and no individual visitor can be identified from it.

You can choose to disable and delete cookies through your browser settings, within your browser's 'Help', 'Tools' or 'Settings' menu. Please note that by disabling cookies you may not benefit from some of the features of our site. You can find out more about deleting or controlling cookies by visiting [aboutcookies.org](http://aboutcookies.org).

## Controlling Your Privacy

If you choose to turn off cookies for all sites, this could affect your use of some of the features of that site. The best option is to disable or enable cookies on a per-site basis. Consult your browser documentation for instructions on how to block cookies and other tracking mechanisms.

## How we use your personal information

We use personal information about you in provide the following:

Provision of services and account management:

- Provide you with the information, products and services that you have requested from us.
- Complete any transaction you are undertaking with us.
- Manage and operate your account with us, including sending you information relating to your account.

- Meet a legal or regulatory obligation.

#### Improvements:

- Make sure that content from our site is presented in best way possible for you.
- Administer our site and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- Notify you about any changes to our service.
- To help us keep our site safe and secure.

#### Marketing:

- We might provide you with information about other services we offer that are similar to those that you already have or have enquired about.

If you do not wish for your personal information to be used for marketing purposes, please contact Mary McFadzean e-mail: [mary@brighterfs.com](mailto:mary@brighterfs.com)

### **Your individual rights**

If you do not want us to use your Personal Information as set out in this Privacy Policy, or you need to provide us with any changes to your personal information, or you would like any more information about the way in which we collect and use your Personal Information, please contact us at Brighter Financial Services Ltd. 66-68 West Street, Sowerby Bridge, West Yorkshire, HX6 3AN.

### **Opting out**

You can decide whether or not you wish to receive information from us.

We will not contact you for marketing purposes unless you have given your prior consent. You can change your marketing preferences at any time by contacting [mary@brighterfs.com](mailto:mary@brighterfs.com)

### **Data Protection**

Brighter Financial Service Ltd. is registered with the Information Commissioner in the UK as a 'data controller' in accordance with the provisions of the Data Protection Act 1998. Further details of the registration are available at [www.ico.org.uk](http://www.ico.org.uk).

Our website is scanned regularly for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology.

If you register for one of our newsletters, it is your responsibility to give us a valid email address and let us know if it changes. We comply with all applicable data protection laws in the UK.

### **Requests for access to Personal Information**

If you would like details of the personal information we hold or process, we would be happy to provide this for you. To protect our customers' personal information, we follow strict storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. We hold client sensitive financial information via a client business exchange system which enables clients to have secure access to information. If clients wish to have hard copy access to their information we will charge £10 for any hard copy data requests. Please direct any such request to the Data Protection Officer by email at [mary@brighterfs.com](mailto:mary@brighterfs.com) or write to Data Protection Officer at Brighter Financial Services Ltd, 66 West St, Sowerby Bridge, West Yorkshire, HX6 3AN.

### **Raising a complaint about how we have handled your personal data**

If you would like to file a complaint with regards to how we have handled your personal data, you can contact our Data Protection Officer as set out above, who will then look into the matter.

Alternatively, if you are dissatisfied with our response or feel we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO) - details can be found here: <https://ico.org.uk/concerns>

### **Sharing your personal information**

In order to complete tasks and provide services to you, we may pass your information to our Partners, administration centres, third party service providers, agents, subcontractors and other associated organisations.

These third parties may include:

- Fund managers, insurers, insurance brokers, or credit brokers to enable us to obtain a quote for you or provide you with other related services.
- Credit reference agencies and other companies for use in credit decisions and fraud prevention.

When we use third parties, we only disclose the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We also work closely with various third-party product and service providers to bring you a range of high quality financial solutions. When you enquire about or invest in one or more of these products or services, the relevant third-party provider will use your details to carry out their obligations

arising from any contracts you have entered into with them. These third-party providers will share your information with us which we will use in accordance with this Privacy Policy.

We may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

Third parties may use cookies, web beacons, and similar technologies to collect or receive information from <https://www.brighterfs.com/> and elsewhere on the internet and use that information to provide measurement services and target ads.

We use technologies, such as cookies, to customise content and advertising, to provide social media features and to analyse traffic to the site. We also share information about your use of our site with our trusted social media, advertising and analytics partners. More details on this below.

### **Facebook Conversion Tracking Pixel**

With your permission, our website utilizes the Conversion Tracking Pixel service of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook"). This tool allows us to follow the actions of users after they are redirected to a provider's website by clicking on a Facebook advertisement. We are thus able to record the efficacy of Facebook advertisements for statistical and market research purposes. The collected data remains anonymous. This means that we cannot see the personal data of any individual user. However, the collected data are saved and processed by Facebook. We are informing you on this matter according to our information at this time. Facebook is able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with Facebook's Data Use Policy found under: <https://www.facebook.com/about/privacy/>. Facebook Conversion Tracking also allows Facebook and its partners to show you advertisements on and outside Facebook. In addition, a cookie will be saved onto your computer for these purposes.

Only users over 13 years of age may give their permission. If you are younger than this age, please consult your legal guardians.

Please click here if you would like to revoke your permission:  
[https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

You can opt-out of the collection and use of information for ad targeting by going to: [www.aboutads.info/choices](http://www.aboutads.info/choices) and <http://www.youronlinechoices.eu/>.

### **Keeping your information safe**

At Brighter Financial Services Ltd., it is our responsibility to look after your personal information and take privacy seriously. We have a number of security measures in place to help prevent fraud and cybercrime.

If we become aware that a personal data breach has occurred and is likely to result in a high risk to the rights and freedoms of our clients, Partners or employees, we will inform them without undue delay.

Our data Protection Policy has been revised in line with the requirements of the EU General Data Protection Regulations and we ensure that Partners and employees undertake mandatory data protection on-line testing on an annual basis, as part of continual professional development.

Data Protection is reviewed as part of our annual compliance programme where we will assess:

1. Internal Company policy and procedure
2. Actual or potential threats to personal/financial data breaches
3. Hard and on-line processes involved in the management of sensitive information.

When you login, or send us information on the internet we protect the security of this information while it is being transmitted by encrypting it using Secure Sockets Layer (SSL).

When you use your web browser to login, view or share information with us, all electronic information exchanged is encrypted using 2048bit SSL (Secure Sockets Layer) certificate. You can identify this by looking for the HTTPS:// and the padlock in the address bar at the top of your browser.

We will always interact with you in a safe, secure and consistent manner.

To keep your information secure and to protect our clients from fraud, Brighter Financial Services Ltd. will only interact with you in the following ways. If in doubt, call a Brighter Financial Services Ltd. member of staff directly or alternatively email the Brighter Financial Services Ltd. Data Protection Officer at [mary@brighterfs.com](mailto:mary@brighterfs.com)

**When interacting with you, we will:**

- Only send funds that you have requested to be withdrawn to a verified bank account in your name.
- Verify who we are speaking to on the phone, by asking you security questions.

We will not:

- Ask you for your password over the phone.
- Send you an unsolicited email with a link to our login page asking you to enter your Online Account credentials.
- Ask you for payment or credit card details by email or over the phone.
- Call you to notify you of a problem, and then request you call us back immediately to discuss the problem further.

We are always reviewing our physical and logical security controls across the business.

Physical controls – As well as protecting your digital information, Brighter Financial Services Ltd. also protects their premises and physical locations where personal data may be used and stored. These safety measures include secure disposal of confidential waste and hardware, personal card access and locks on doors and file storage cabinets, with a ‘clear desk’ policy to ensure all information is locked away and protected.

Logical controls – Brighter Financial Services Ltd. uses technical security measures to make sure our systems where we store and use personal information are protected from unauthorised access. Tools such as authentication controls, antivirus, firewalls, malware detection and back-up procedures are used across the business.

All employee emails and devices are encrypted to enable secure transfer and storage of personal information.

We conduct security testing of our applications and services in a controlled testing environment before they are made available for our clients to use on an ongoing basis.

We perform security risk assessments for each of our sites to identify and control risks.

We have a business resiliency plan with disaster recovery and business continuity testing.

The purpose of Business Continuity Management and the Brighter Financial Services Ltd. Business Continuity Plan, is to provide an effective, predefined and documented framework to respond to an incident affecting the Group’s activities. The key drivers in developing the business recovery plans are;

To mitigate the risks that could lead to the significant disruption of our products and services to our clients.

To provide a recovery plan that supports a timely and full restoration of our products and services for our clients

However, whilst we take appropriate technical and organisational measures to safeguard your Personal Information, please note that we cannot guarantee the security of any data that you transfer over the internet to us.

### **Transferring your information outside of the European Union**

We operate internationally and as part of the services offered to you by Brighter Financial Services Ltd., the information which you provide to us may be transferred to countries outside the European Union (“EU”).

This may happen if any of our servers are located in a country outside of the EU. If we transfer your information outside of the EU in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

## **Google**

Google's advertising requirements can be summed up by Google's Advertising Principles. They are there to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have enabled Google AdSense on our site.

It's also important to note that we allow third-party behavioural tracking.

## **Google Analytics**

This website uses Google Analytics, which uses cookies to help the website operators analyse how people use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

We also use Google's remarketing technology to advertise online. In doing so, Google will place or read a unique ad-serving cookie on your computer and will use non-personal information about your browser and your activity on our sites to serve ads on their content network. Please [click here](#) for more information about remarketing or to opt-out of the Google remarketing cookie.

We will only collect personal information about you if you send us an e-mail enquiry via the 'contact page' on our website. In order for this to happen, you will need to fill out the on line 'contact' form. The type of information being collected for an enquiry will be apparent from the layout of the 'contact' form, which also tells you how this information will be used.

We take all reasonable precautions to protect our visitors' information, both on and off line. If your personal information changes, please let us know and we will correct, update or remove any information that we hold about you on our active databases. We may however need to retain archive copies of that personal information for legal or audit purposes.

By using this website, you give consent to the processing of data about you by Google in the manner and for the purposes set out in the above four paragraphs.

## **Monitoring**

If you communicate with us via e-mail, telephone or fax, this communication may be randomly monitored and/or recorded to protect the interests of our business and our customers. This includes for the purposes of maintaining customer/service quality standards, detection of and/or prevention of crime and to ensure that Brighter Financial Services Ltd. employees comply with legal obligations and Brighter Financial Services Ltd. policies and procedures (including our customer relations practices).



## **Hyperlinks**

We may provide hyperlinks from this web site ('the Site') to web sites of other organisations including websites of associated companies. Please note that this Privacy Policy applies only to this Site and that Brighter Financial Services Ltd. will not be liable for the contents of linked web sites or any transactions carried out with organisations operating those web sites

## **Our details**

1 This website is owned and operated by Brighter Financial Service Ltd.

2 You can contact us:

(a) by post, using our postal address;

Brighter Financial Services Limited  
66-68 West Street  
Sowerby Bridge  
West Yorkshire  
HX6 3AN

(b) Using our website [contact form](#)

(c) By telephone; 01422 832100