

PRIVACY NOTICE

Nexus IFA Limited & Nexus Financial Planning understand that your privacy is important to you and that you care about how your personal information (personal data) is used. We respect and value the privacy of all our clients and will only collect and use personal information in ways that are described here, and in a way that is consistent with your rights under the law and our obligations under the Data Protection Act (DPA) 2018, the Privacy and Electronic Communications Regulations (PECR) and the EU General Data Protection Regulation (GDPR).

WHO WILL PROCESS YOUR PERSONAL INFORMATION?

Your personal data will be initially processed by the Advisers & staff of Nexus IFA Limited and/or Nexus Financial Planning, both firms are Appointed Representatives of In Partnership, a trading name of The Whitechurch Network Limited. Your personal data will be further processed by On-Line Partnership Group Limited on behalf of its subsidiary company The Whitechurch Network Limited who act as our Principal for regulatory purposes. All parties who process your personal data will do so in accordance with the requirements of Data Protection legislation.

WHY IS YOUR PERSONAL INFORMATION REQUIRED?

Your personal information may be required to reply to an enquiry, or to enable us to take the necessary steps at your request prior to entering into a contract to provide financial services and to perform such a contract. This may include identity and age verification checks, reviewing assets and liabilities, bank account validation, credit checks, preventing and detecting fraud, money laundering or other crimes and any other requirements in accordance with rules set by the Financial Conduct Authority (FCA) or other applicable legislation.

WHAT HAPPENS IF WE WANT TO PROCESS YOUR INFORMATION FOR OTHER REASONS?

Though there are some legal exceptions, if we wish to process your personal data for any other unrelated purpose than those we have informed you about we will notify you.

WHAT ARE THE CONSEQUENCES IF YOU DO NOT PROVIDE YOUR PERSONAL INFORMATION?

Your personal data is essential to enable us to answer your enquiry, or to take steps (at your request) prior to entering into a contract to provide financial services, or to perform a contract to which you are a party. Without this information we will not be able to proceed any further.

WHAT MAKES THE PROCESSING LAWFUL?

Because the processing is necessary:

- for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- for compliance with a legal obligation to which we are subject;
- for the performance of a task carried out in the public interest;
- for the purposes of the legitimate interests pursued by us;
- as you have given clear consent to process your personal data for a specific purpose.

TYPES OF INFORMATION WE PROCESS

Information about you that we collect and use includes:

- Information such as your name, date of birth and contact details;
- Identification information including passport, driving licence, national identity card (for non-UK nationals), government issued ID verification and address verification documents such as council tax letters or bank statements and evidence of benefit entitlement;
- Employment information such as job title and employment history;
- Financial Information relevant to products we provide;
- Information relating to your personal finances such as your financial liabilities and assets, income and outgoings;
- Information classified as 'sensitive' personal information, e.g. relating to your health, race or ethnic origin. This information will only be collected and used where it's needed to provide a product or service you have requested or to comply with our legal obligations;
- Information connected to providing a specific product or service;
- Information about your family including information about your dependants;
- 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 or an IP address from submission of an online form;
- Information if you visit our office, e.g. visual images collected via closed circuit television (CCTV);
- Information about your family including information about your dependants;
- Your marketing preferences.

KEEPING YOUR INFORMATION UP TO DATE

We will record your information exactly as you provide it. You may ask us to update it at any time and we will action your request promptly and where possible notify relevant third parties of any changes.

WHAT ABOUT SENSITIVE PERSONAL DATA?

Unless we are processing because it is necessary for reasons of substantial public interest, we will only process sensitive personal data, such as data concerning health, race or ethnic origin, with your explicit and informed consent for specific processing activities. In such cases you will be asked to sign a separate consent form to evidence this and that you understand the purpose(s) of the processing of such data. Your consent may be withdrawn at any time.

HOW DO WE COLLECT YOUR INFORMATION?

We may collect your personal information from a variety of ways, directly and indirectly, including:

- your meetings with us, telephone conversations or video conferences
- emails, letters or forms you send us
- application forms you complete for products or services
- questionnaires (including online ones) you complete
- your submission of our website forms
- publicly available sources such as the electoral roll, court judgments, insolvency registers, internet search engines and social media sites.
- from third parties who provide anti money laundering and fraud prevention services who carry out electronic ID checks, sanctions and politically exposed persons checking services.

WHAT INFORMATION IS REQUIRED?

We only collect information that is necessary to carry out the purposes listed in carrying out the services requested by you. This includes information you supply and data we receive from reference agencies. Where practical and lawful we will inform you about any personal data we receive about you from third parties that you may be unaware of.

HOW WILL WE FURTHER USE YOUR PERSONAL INFORMATION (OUR LEGITIMATE INTERESTS)?

- To contact you to ensure that our records of your personal information are correct;
- to respond to questions or complaints you have about our services;
- to update you with changes in our terms;
- for statistical or research analysis relating to the performance of our business or that of our principal and understanding the changing needs of our clients;
- to review, improve and develop services we offer or handle complaints;
- to pursue debts or unpaid fees;
- to evidence company practices;
- to evidence the standards and processes carried out conform to the company's ethical standards and expectations;
- for direct marketing activities;
- to protect the business from risks which might be introduced by an individual.

You have the right to object to processing for these purposes and we shall cease unless we can show we have compelling legitimate grounds to continue.

WILL WE SHARE YOUR INFORMATION WITH ANYONE ELSE?

We may share your information with:

- Appropriate staff such as those who carry out financial or compliance functions.
- Organisations that need your information because we are required to provide it by law (e.g. The FCA, ombudsman services, HMRC etc).
- Organisations that carry out credit references or identity checks such as GB Group Plc or CreditSafe Business Solutions Ltd. These organisations may keep a record of the information and may disclose the fact that a search of its records was made to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors.
- Sometimes other authorised firms with specialist advisers, such as pension specialists, who assist us in providing suitable financial advice and services. You will be provided with their details if this applies.
- Organisations and individuals contracted by us to carry out specific administrative, financial, compliance or direct marketing functions. These contractors only act as data processors and will only process your information under our instructions and operate under the same obligations for data protection as we ourselves operate. Examples of such organisations would be to provide product research quotes; e-signature facilities; email marketing platform (for direct marketing).
- Law enforcement agencies, courts or other public authorities if we have to, or are authorised to by law.
- Product providers we use to provide financial services.
- Where we or our Principal go through a business transaction, such as a merger, being acquired by another company or selling a portion of its assets, your information will, in most instances, be part of the assets transferred.
- Where you give clear consent for us to share your information with a third party you name.

PROCESSING WHEN PERFORMING A TASK CARRIED OUT IN THE PUBLIC INTEREST

We will use the information provided to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent to ensure this function is not prejudiced. Part of this processing involves verifying your identity using third parties such as GB Group Plc or Creditsafe Business Solutions Ltd.

HOW SECURE WILL YOUR DATA BE?

We will ensure that your data is only accessible to authorised people in our firm and will remain confidential at all times. Appropriate security measures will be in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information.

If we have a contract with another individual or organisation to provide us with services or a service on our behalf to process your personal information, we'll ensure they act in compliance with Data Protection legislation regarding confidentiality with appropriate security measures in place, and only process your information in the way we've authorised them to. These individuals and organisations won't be entitled to use your personal information for their own purposes. Please contact our Data Controller if you would like further information.

TRANSFERRING DATA OUTSIDE THE EUROPEAN UNION

We do not usually transfer any of your personal information outside of the EU except:

- When we need to perform pre-contractual measures (credit and identity checks) or because the checks we request are necessary for important reasons of public interest. Some companies, like Creditsafe Business Solutions Ltd, may transfer data outside of the EU to countries which do not, in the view of the EU Commission, offer an adequate level of protection. In such cases Creditsafe encrypts any data it sends to other agencies and only transfers information necessary to carry out checks.
- When we use a third party data processor organisation contracted to perform specific functions, some of them may transfer and process this data outside of the EU. In such cases they have agreed to provide an adequate level of protection for the data processed, in line & accordance with the requirements of EU Data Protection Regulations, e.g. EU-US Privacy Shield scheme.

AUTOMATED DECISION-MAKING PROCESSES

We may sometimes use automated processes when making decisions but you will not be subject to a decision based solely on automated processing, including profiling.

TELEPHONE CALL RECORDING

In line with The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 we may record incoming or outgoing telephone conversations for the following purposes:

- Establishing facts and evidence for business transactions;
- Ensuring compliance with regulatory or self-regulatory practices;
- Ascertaining and demonstrating that standards are being met;
- Preventing or detecting crime;
- Investigating or detecting the unauthorised use of that or any other telecommunication system;
- Safeguarding the effective operation of the telecommunications system.

WHAT ABOUT DIRECT MARKETING?

We will use the information provided now and in the future to carry out direct marketing activities as these are legitimate interests pursued by us. Sometimes this includes, with your consent, sharing data with product providers for their marketing activities. You can choose which method you'd prefer us to use to contact you (by email or post) and you have the right to object at any time to the use of your personal data for this purpose and we will cease marketing activity. Contact our Data Controller (see below) to let them know about your preferences.

VISITORS TO OUR WEBSITE & COOKIES

When someone visits our website - www.nexusifa.co.uk - we use a third party service, Google Analytics, to analyse visitor behaviour patterns. Google Analytics uses cookies. This information is only processed in a way which does not identify anyone. The only personally identifiable information collected through our website is via enquiry forms. We will use the information you supply in a form, such as your contact details, to communicate with you, and if you consent by subscribing, use your information to send you newsletters and details about our products and services.

Full details about how we use cookies can be found on the Cookie page of our website : www.nexusifa.co.uk/cookies.html

HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

We will not keep your information for longer than is necessary in light of the reason(s) for which it was first collected. The Financial Conduct Authority lays down rules relating to how long information should be held for and we will keep your information to meet these requirements. The following factors will be used to determine how long your personal data is kept by us:

- Business requirements
- Legal requirements
- Regulatory requirements

REQUESTING A COPY OF THE INFORMATION WE HOLD

You may at any time ask for a copy of the information we hold about you – it is your legal right. This is known as a “subject access request”. We request that all subject access requests be made in writing (including by email). There is not normally any charge for a subject access request. We will provide you with a copy of any non-exempt personal information within one month, unless your request is complex or we receive numerous requests at the same time, when we may extend it to two months. To protect your personal data, we will ask you to verify your identity before we release any information. Where we are unable to confirm a person's identity no information will be released. Please contact our Data Controller (details below) to request a copy of your data.

IMPORTANT RIGHTS

You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of our legitimate interests or in the performance of a task carried out in the public interest. We will no longer process your data unless we can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims.

You have the right to object at any time to processing your personal data for marketing activities. In such a case we must stop processing for this purpose.

WHAT ARE YOUR OTHER LEGAL RIGHTS?

In addition to the rights above the additional following rights:

- You have the right to be informed about the collection and use of your personal data;
- Where you have given consent, you have the right to withdraw previous consent to processing your personal data at any time;
- You have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning your data;
- You have the right to receive data you have provided to us in a structured, commonly used and machine readable format;
- You have the right to lodge a complaint with the regulator (please see below).

To exercise any of these rights please contact our Data Controller (details below).

HOW TO CONTACT OUR DATA CONTROLLER

You can contact our Data Controller about any data protection or marketing consent issues by:

- Writing to: **Nexus Data Controller, 2-4 York Buildings, Cornhill, Bridgwater, Somerset, TA6 3BS**
- Telephoning: **01278 439494**
- Emailing: **datacontroller@nexusifa.co.uk**

HOW DO YOU MAKE A COMPLAINT TO THE REGULATOR?

- By writing to:
**Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF**
- By telephoning: **0303 123 1113**
- By emailing: **casework@ico.org.uk**
- By using their website: **<https://ico.org.uk/make-a-complaint/your-personal-information-concerns>**

CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business practices in a way that affects personal data protection.

The latest version of our Privacy Notice is always available on our website at: www.nexusifa.co.uk/privacy-notice.html