

Innovate Financial Solutions Limited

Independent Financial Advisers

21 Coggeshall Road

Braintree, Essex CM7 9DB

T: 01621 854402

E: info@innovatefs.co.uk W: www.innovatefs.co.uk



Client Privacy Notice

How we use your information

This privacy notice tells you what to expect when Innovate Financial Solutions Ltd (Innovate) collects personal information. It applies to information we collect about you.

We may collect and process the following data about you;

Information that you provide by filling in forms on our True Potential Platform.

Information that you provide to us by telephone, e-mail or face to face.

If you contact us, we may keep a copy of that correspondence.

Visitors to our Website

When someone visits www.innovatefs.co.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

E-Newsletter

Innovate uses a third party provider, Webit4u, to deliver our monthly e-newsletter. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. The E-Newsletter has an unsubscribe option. For more information, please see Webit4u's privacy notice.

Website Security & Performance/Activity

Innovate uses a third party service (Designfolk Ltd) to help maintain the security and performance of its website. To deliver this service it processes the IP addresses of visitors to our website.

People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

People who make a complaint to us

When we receive a complaint from a person we record details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer.

We may be required to provide a copy of our file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint case.

We are required to disclose to The Financial Conduct Authority (FCA) high level analytics concerning the number and nature of complaints received. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 50 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

People who use our services

Innovate provides a range of Financial Services to Data Subjects. We process data provided by the data subject and other sources in order to deliver the appropriate products and services to Data Subjects.

We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a Financial Review to carry out a survey to find out if they are happy with the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

Use of Data Processors

Data Processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

The Data Processors / Third parties that we use include:

Banking arrangements – NatWest Bank

Legal opinion where required – Palmers Solicitors

Regulatory and Compliance opinion where required – Compliant Solutions Limited

Sanctions and PEPs checking (Anti Money laundering) – Creditsafe

Back Office Systems – True Potential

Data Storage – Microsoft Sharepoint

Your Rights

Under the General Data Protection Regulations (GDPR) 2018, you have rights as an individual which you can exercise in relation to the information we hold about you.

Access to Personal Information (Portability)

Data Subjects may submit a Subject Access Request in order to obtain a copy of the personal data that we hold about them in a structured and portable manner. All SAR requests should be sent to:

Gary Lewis, Data Protection Officer, Innovate Financial Solutions, 21 Coggeshall Road, Braintree, CM7 9DB. Tel 01621 854402.

Confirmation of whether, and where, the controller is processing personal data

Innovate Financial Solutions Ltd is the Data Controller and a Processor. Innovate Financial Solutions Ltd undertakes data processing within the UK.

Right of Data Subjects to Erasure (Right to be forgotten)

Data Subjects may notify the Firm if they wish to exercise their right to erasure. Such a withdrawal of Consent does not affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact.

Innovate may retain a copy of any personal data. This material may be retained by the Controller if the processing is necessary for the establishment, exercise or defence of legal claims.

Right of Rectification

Innovate will seek to ensure that inaccurate or incomplete data will be rectified. Data Subjects have the right of rectification.

Right to Object to Processing for the Purposes of Direct Marketing

Data Subjects may notify the Firm if they wish to exercise their right to be removed from any Direct Marketing activities. Innovate may still contact the Data Subject in order to fulfil any contractual obligations concerning the policies and services provided.