

PRIVACY NOTICE FOR EXISTING BRI CLIENTS OF THE FOLLOWING SERVICES:

**WEALTH MANAGEMENT
INVESTMENT MANAGEMENT
FINANCIAL PLANNING
INTERMEDIARY SERVICES
PERSONAL PORTFOLIO SERVICE**

Protecting your Personal Information

To advise you properly we will need to collect information about your personal and financial circumstances. We take your privacy seriously and will only use your personal information to deliver our services and where required by law.

For the purpose of the Data Protection Act 2018 (DPA) and the General Data Protection Regulations 2018 (GDPR) and Applicable Regulations we are a 'data controller' which has consequences for how we use, store or otherwise process any personal data provided by you, your agents or representatives.

Sometimes, we may need to pass your personal information to other organisations. For example, if you apply to take out a financial product or service, we will need to pass certain personal details to the product or service provider.

To fulfil our legal obligations in respect of prevention of money-laundering and other financial crime we give your information to and receive information from fraud protection agencies. The organisation that we instruct to carry out fraud prevention checks is SmartSearch (www.smartsearchuk.com) which accesses information held by the fraud prevention agency Experian (www.experian.co.uk) and Equifax (www.equifax.co.uk) to carry out its checks. Both SmartSearch, Experian and Equifax are data controllers under Data Protection Laws. In order to carry out checks SmartSearch, Experian and Equifax may check the details that we provide to them against any database (public or otherwise) to which they have access. A record of the searches will be retained but it will have no effect on your credit rating.

We rely on the following legal bases for processing as defined in the DPA and GDPR to use personal data for the permitted purposes detailed in these Terms and Conditions:

- a) That we have received consent from you and any other data subject to such processing;
- b) That the processing is necessary for compliance with our legal obligations;
- c) That the processing is necessary for us to provide our service under this agreement;
- d) That the processing is necessary for the legitimate interests of us and any third-party recipients that may receive personal data.

We may, for any permitted purpose, transfer or disclose personal data to any third-party anywhere in the world, to any person acting on our behalf or to any person to whom we are permitted to delegate any of our functions under this agreement, to any regulators and governmental agencies, in any jurisdiction, where we are required to do so by Applicable Regulations.

Where any of these third-parties are based outside the EU, including countries which may not have the benefit of equivalent data protection legislation we will only transfer personal data subject to appropriate safeguards, copies of which are available from pcm@brigroup.co.uk.

Your personal information may be transferred electronically (e.g. by email or over the internet) and we, or any relevant third-party, may contact you in future by what we believe to be the most appropriate means of communication at the time (telephone, email or letter).

The organisations to whom we may pass your details also have their own obligations to deal with your personal information appropriately.

If you do not want your Personal Data to be used for marketing purposes, you can make a notification to marketing@brigroup.co.uk.

Where you provide information about others (such as joint account holders, your spouse or partner, dependents or other family members, third parties with authority on your account, attorney's under a Power of Attorney, executors, personal representatives, potential beneficiaries or other person), you confirm that you have their consent or are otherwise entitled to provide this information to us and for it to be used by us.

Any data subject in respect of whom we hold personal data has the right to:

- a) ask for a copy of the information we hold about them by writing to the Privacy Compliance Manager at BRI House, Elm Court, Meriden Business Park, Coventry, CV5 9RL or emailing pcm@brigroup.co.uk.
- b) raise complaints in relation to our processing of their personal data with the Information Commissioners Office;
- c) withdraw the consents to processing data, although this will not affect any data processed prior to this withdrawal and may mean we will not be able to provide services to you;
- d) object to the processing of personal data on the legal basis of legitimate interests and request that we demonstrate our legitimate grounds in order to continue such processing;
- e) to request the erasure of personal data where it is no longer required for the purposes for which it was collected or where it was unlawfully processed;
- f) request that we rectify inaccuracies in personal data;
- g) request that we restrict any processing of their data only to holding of the data while any disputes with us are being resolved, or for assistance with establishing, exercising or defending legal claims (where we would otherwise no longer need to retain such data for the permitted purpose described above).

By entering into this agreement, you confirm that:

- a) You agree to the processing of your personal data, or that of other data subjects, by us or a third-party for the purpose of delivering our services;
- b) Where you are an individual, providing us with personal data concerning other data subjects, or a corporate providing us with the personal data of your employees, trustees, directors, agents and representatives, you have obtained their explicit consent to using their personal data for the permitted purposes described above, and can demonstrate this to us if requested;
- c) You agree that our processing for the permitted purposes is warranted as it is necessary for our legitimate interests, and that this does not prejudice your rights or those of the other data subjects involved.

This version of the privacy notice was last updated on 10 June 2020.