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Data Privacy Notice

“About our client data protection procedures . . .

Provided to new customers, or presented to potential new customers, as part of our initial engagement approach, when re-engaging with existing clients and where data protection information is requested by, or requires re-issuing to, customers.

This document provides detailed information about our client data protection policy, our internal procedures and our overall approach to the fair processing of customer data.

You need to read this important document carefully so that you have a clear understanding of how and why we collect, share, store and use client data, your rights in relation to your personal and special category personal data, and how to contact us, as well as the relevant authorities, in the event you have a complaint or concern in relation to a data protection matter.

Our Data Privacy Notice is also available to view by way of links in electronic communications and our website.

Our data privacy commitments

When providing services to you, we will collect personal information about you, which may also include information about others related to you. We take customer data privacy and our data protection responsibilities very seriously. We commit to being open and transparent with you as to the types of information we collect about you, and any others, why we collect such information and how we use it, as well as who we may share it with.

When collecting and using client personal information, in the normal course of providing you with our insurance advising and arranging services, we are responsible for certain personal data about you and are required to comply with all current data protection regulation, **as we are responsible as the Data Controller of your personal data** for the purposes of data protection laws and requirements. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided below, on **page 7**, under the heading - **How to contact us**.

Our details

Where we refer to **Aegis Advisers** in this notice, and where the words “**our**” or “**us**” or “**we**” are used, we are referring to a trading name of **Invicta Financial Services Limited** – a private limited company, registered at **High Weald House, Petteridge Lane, Petteridge, Matfield, Kent TN12 7LT** – company number: **05438422**

Our parent company

Invicta Financial Group Limited, our parent entity, is a holding company and does not itself provide financial advice or regulated services to customers, but does provide us with administration support, centralised back-office resources, staff and other management functions, and is the actual employer for all staff that undertake an administration or adviser support role, serving the following:

- **our clients;** and
- **the management, advisers, associated companies & business entities that make up the group.**

Our parent entity, its management and staff will only ever process your personal data when providing us with the above resources and always in accordance with our collective data protection responsibilities.

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What type of personal information will be processed and why?

We may ask you to provide personal information by completing electronic or paper copy forms and documents, or by corresponding with us by e-mail, letter, telephone, or otherwise, during the course of our communications, engagements and relationship with you. The personal data that we may ask you to provide, and the reasons why we ask you to provide it, are set out below.

Types of personal information	Why we collect this information?
<ul style="list-style-type: none"> Identity details, including your name and date of birth – We may ask for copies of identity and proof of address documents, in which case, we may collect details including your place of birth and residential address: Your contact details, including your e-mail and postal address(es), telephone contact number(s) and other personal details about you, including your job title, marital status and personal title: 	<ul style="list-style-type: none"> To carry out anti-money laundering and financial checks for crime prevention and fraud detection purposes – We only ever use copies or other forms of photographic images of identity documents for this purpose; We collect and process this personal information in order to comply with our legal and regulatory responsibilities. To contact you in order for us to administer, manage, and provide our services to you; To respond to any correspondence and service-related enquiries you send to us in respect of our services; To discuss financial products or services for which you are making an application or may be interested in making an application; To manage any application(s) you make for financial products or services; To communicate any updates to you, including any changes to our services, the terms and conditions of any services which we have provided to you, any changes to this Notice and to those on our website(s); To contact you in order to receive your feedback on our services and to participate in related surveys.
<ul style="list-style-type: none"> Financial information relating to you, including bank account and credit card balances, details of other financial products, mortgage(s) and other financial liabilities, payment card details and your income or salary information: 	<ul style="list-style-type: none"> To evaluate the availability and suitability of products and related services, as well as to enable us to advise you on your financial circumstances and the appropriateness of specific courses of action and products – We collect and process this personal information in order to provide the services to you that you have requested and for our legitimate business interests.
<ul style="list-style-type: none"> Details of any dependents, who may be adults or minors, including name(s), date(s) of birth and, where relevant, future aspirations and financial requirements: 	<ul style="list-style-type: none"> To enable us to provide you with services that you have requested that would involve, or have an impact on, any dependents – Where those dependents are adults, you will need to ensure that you have their consent to provide us with their personal information.
<ul style="list-style-type: none"> Lifestyle information: 	<ul style="list-style-type: none"> During our conversations with you about your insurance needs and requirements, we are likely to discuss and take notes in relation to a variety of issues relating to your circumstances, for example, your hobbies and pursuits, job role, marital status, and other relevant information specific to your requirements – We discuss and record this kind of information to enable us to provide you with appropriate personalised advice and to make recommendations that are suitable for your circumstances, insurance needs, financial objectives and priorities.

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Types of personal information

- Details of the contact that we have had with you, including face to face, telephone and ‘virtual’ meetings we hold with you, fact-finding discussions and other relevant documentation, personalised illustrations and quotations, recommendations and external referrals:
- Details of services you have previously received:
- Customer experience and all other feedback and information you provide to us:
- Information in relation to complaints and all other relevant incidents –
*Please also see the section below under the heading - **When we record communications** on **page 4**:*
- All of the personal information described above:

Why we collect this information?

- To allow us to provide a professional service to you and to contact you, when appropriate, with information about other services that we offer, where we believe such services will be of interest and value to you, subject to your consent.
- We collect and process this personal data for our legitimate business interests.
- To review your experience and feedback you provide us, so that we can improve our services, for you and for our other customers –
We collect and process this personal information in order to provide the services to you that you have requested and for our legitimate business interests.
- We collect and process this personal data for our legitimate business interests –
We record certain telephone calls, including where we receive a complaint matter by telephone, as well as for quality and training purposes.
- We may disclose your personal information to third parties where we are required to do so, to comply with applicable laws and regulatory requirements, including in circumstances where we are required to do so as a result of a Court Order, regulatory authority or any other third party with the lawful right to request and receive the personal information we hold about you, such as law enforcement agencies and tax authorities;
- We may also use your personal information where it is necessary for us to take legal advice in order to establish our legal rights, when appropriate, to bring a claim against you or any related parties, or to defend a claim from you or any related parties –
We collect and process this personal information for our legitimate business interests, including to carry out our own audit, compliance, internal business planning, quality assurance and for staff training purposes;
All of the above relate to the collecting and processing of personal data for our legitimate business interests.

Special category personal data

Depending upon the types of products and services you require, we may also need to collect information from you, and about you, that is treated as “**special category personal data**”, which is classified as sensitive personal data under data protection law. The special category personal data that we may ask you to provide, and the reasons why we ask you to provide it, are set out below and on **page 4**.

Some product providers may ask for certain information in the course of your application for their products or services relating to your ethnic or racial origin and your sex life or sexual orientation. **We will never ask you for this type of information other than for provider application requirements.** We will only process this type of special category personal data, and that detailed below, with your explicit consent. We will obtain your agreement to the processing of such data by asking you to confirm your consent.

Once you have decided to appoint us, we will provide you with a **Client Data Privacy Declaration**, for your completion and return to us, that will confirm your consent, which we will retain for our client records.

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You may choose not to provide us with your consent. However, please note that if you do not provide us with your consent specifically to collect and process this type of data:

- we may not be able to advise you fully in respect of certain products and services which require this information, in particular those relating to health-related or life insurance;
- your application may be rejected by the providers of products and services which require this information; or
- in certain circumstances, the illustrations or quotations for such products and services may be higher than would be the case if, such information were to be provided.

Types of special category personal information	Why we collect this information?
<ul style="list-style-type: none"> • Information relating to your physical or mental health: 	<ul style="list-style-type: none"> - Certain products and services that you request, or we consider to be suitable for your insurance needs, may require this information; - To advise you on, and to submit applications, for insurance products, we will need to collect information relating to your physical and mental health, to obtain accurate illustrations or quotations; - To advise you on the suitability of products, insurance premiums and eligibility for certain products will, in part, depend on your physical and mental health – We will usually collect this information in the course of meetings with you, using specific questionnaires, or in the process of completing an application form for such products and services; - To advise you on, and to submit applications, for health or life insurance products, we will need to collect information relating to your physical and mental health in order to obtain accurate illustrations or quotations.
<ul style="list-style-type: none"> • Information relating to your dependent(s)' physical or mental health: 	<ul style="list-style-type: none"> - Where you are responsible for a dependent's care, assessing our advice and recommendations in relation to any financial requirements resulting from those responsibilities.

When we record communications

We, and persons acting on our behalf, may record and/or monitor communications between our staff and you, including when using chat rooms, e-mails, fax, instant messaging, telephone conversations over landlines and mobile telephones, and other forms of electronic communication. We only record communications between us and you in order to comply with our legal and regulatory requirements.

We may also record and/or monitor communications for training and quality assurance purposes, but will always disclose this to you, before recording communications for these purposes. Should you object to this, you have the right to request that such recording and monitoring of communications for training and quality assurances purposes does not proceed. If you choose to object in such circumstances, you will be made aware that we will still be entitled to record and/or monitor communications if we are under a legal obligation to do so – **but will only be able to use the recordings for those purposes.**

Who might my personal data be shared with?

We may disclose your personal data to the following categories of recipients:

- **To providers of products and services** - in respect of whom you request us to submit applications on your behalf and to receive updates from such providers in order for us to provide our services to you throughout the duration of our relationship with you;

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- **To our suppliers and strategic partners** - in order for them to help us provide our services to you, including our back office and paperless office systems providers, other IT systems, as well as assist us with providing you an efficient, modern and professional service;
- **To suppliers of regulatory compliance support services** - who may review our records containing your personal data in order to audit and report to us on our compliance with applicable laws and regulatory requirements;
- **To Invicta Financial Group Limited** - our parent company, which provides us with accountancy and compliance support and shared back-office services, who will only ever process your personal data for these purposes;
- **To one of the other financial advice channels that make up the Invicta Financial Group** - where that other group entity is better-placed to provide you with advice, for example, where that other group entity specialises in an area in which you are interested or require advice and services. We will only transfer a copy of your file or such required relevant information to that other group entity with your permission;
- **To a prospective buyer, its adviser or agents** - in the event that our parent company intends to sell any part of its business or its assets, or if substantially all of its assets are acquired by a third party, in which case your personal data could form part of one of the assets sold, provided that the buyer is informed that it must use your personal data only for the purposes described in this document. Neither we nor Invicta Financial Group Limited will ever rent or sell your personal data, other than as part of a legitimate business sale;
- **To any national and/or international court, enforcement body, government agency or regulatory authority** - where we believe disclosure is necessary;
 - as a matter of applicable law or regulation, including where we are required by law to provide information to organisations such as **Her Majesty's Revenue & Customs (HMRC)**;
 - to exercise, establish or defend our legal rights; or
 - to protect your vital interests or those of any other person; and
 - to any other person with your consent to a disclosure or where the law requires or permits us to do so.

We may obtain certain information about you from third party sources, but only where we have checked and confirmed that such third parties are legally permitted or required to disclose your personal data to us.

In particular, when required, once you have provided your acceptance of our engagement terms for us to act on your behalf, we will send a **Letter of Authority** signed by you to each of the providers with whom you hold existing financial arrangements or insurances, so that we can obtain relevant details and advise you as required. This will help us undertake the best possible assessment of your financial situation, taking into consideration any relevant existing arrangements or insurances.

Our legal basis for processing personal data

Our legal basis for collecting and using your personal data will depend on the personal data concerned and the specific context in which we collect it. In respect of the personal data and the purposes for which we may process your personal data, which are set out in this document, we have confirmed the legal basis upon which we collect and process your personal data in the relevant section above on **page 2**, under the heading - **What type of personal data will be processed and why?**

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, or with your explicit consent, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not, as well as making clear to you the possible consequences if you do not provide your personal data.

If we collect and use your personal data relying on our legitimate interests, or those of any third party, we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about the legal basis on which we collect and use your personal data, or need further information, please contact us using the contact details provided below on **page 7**, under the heading - **How to contact us**.

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International Data Transfers

We may need to transfer personal data to countries outside of the United Kingdom. When we export your personal data to a different country, we will take steps to ensure that such data exports comply with applicable laws.

For example, if we transfer personal data outside the European Economic Area (EEA), such as to the United States, we will implement an appropriate data export solution such as entering into contracts with the data importer that contain EU model clauses or taking other such measures to provide an adequate level of data protection. **We currently only process customer personal data inside the EEA.**

Your data protection rights

You have data protection rights under current data privacy law.

If you wish to access, correct, request the deletion of, or advise us of an update your personal data, you can do so at any time by contacting us using the details provided below on **page 7**, under the heading - **How to contact us**.

In addition, you can object to us processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data. Again, you can exercise these rights by contacting us using the details provided below on **page 7**, under the heading - **How to contact us**.

Similarly, if we have collected and processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we have conducted prior to your withdrawal. It will also not affect processing of your personal data conducted in reliance on lawful processing grounds other than consent. Again, you can exercise this right by contacting us using the details provided below on **page 7**, under the heading - **How to contact us**.

You have the right to complain to a data protection authority about our collection and use of your personal data. We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate. You can do so at any time by contacting us using the details provided below on **page 7**, under the heading - **How to contact us**.

If you want to make a complaint about the way we have processed your personal information to the United Kingdom (UK) data protection authority, the **Information Commissioner’s Office (ICO)** is the statutory body in the UK that oversees data protection law. Further information is available on the ICO website:

<https://ico.org.uk/make-a-complaint>

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can find out more about your data protection rights, by visiting the ICO website:

<https://ico.org.uk/your-data-matters/>

The FOS can be contacted by telephone: **0303 123 1113**

You have the right to opt-out of marketing communications we may send to you at any time. You can exercise this right by clicking on **unsubscribe** or **opt-out** links in marketing e-mails we send you.

To opt-out of other forms of marketing, such as postal marketing or tele-marketing, please contact us using the contact details provided below on **page 7** under the heading - **How to contact us**.

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Data retention

Personal data will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes as set out in this notice, or as otherwise required by law. We retain personal data we collect from you where we have an ongoing legitimate need to do so, for example:

- **To provide you with a product or service you have requested us to provide;**
- **To perform our contractual obligations to you;**
- **To comply with applicable accounting or tax, legal and regulatory requirements;**
- **To defend or manage any claims or complaints between you /or any relevant third party and us -** including taking legal advice in respect of such claims in order to defend, establish or exercise our legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, ombudsman service or regulatory authority.

When we have no ongoing legitimate need to process your personal data, we will either delete or anonymise it or, if this is not possible, for example, because your personal data has been stored in back-up archives, then we will securely store your personal data and isolate it from any further processing until deletion is possible.

Updates to this document

We may change or update this **Data Privacy Notice** in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our data protection policy, our internal procedures, or this document, we will take appropriate measures to inform you, consistent with the significance of the changes we have made.

How to contact us

It is important to us that, as a customer or potential customer, you have a clear understanding of how we work with you, our client data protection procedures, and the important information included in this document. Should you have any questions or concerns regarding any of the above, or if there is anything that requires further clarification, please speak with your adviser or contact us immediately:

- ... *in writing* - **Aegis Advisers**
High Weald House, Petteridge Lane, Petteridge, Matfield, Kent TN12 7LT
- ... *by phone* - **Tel. No: 01892 725115**
- ... *by e-mail* - **dataprotection@aegis-advisers.co.uk**

As already mentioned above, once you have decided to appoint us for your financial protection advice needs, we will provide you with a **Client Data Privacy Declaration**, for your completion and return to us, which we will retain for our client records, that will confirm your acknowledgement of receipt of the data privacy information we have provided and your consent to our processing, where required, of your special category personal data, as well as your preferences in relation to receiving communications from us about other products or services.

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www.aegis-advisers.co.uk

Aegis Advisers is a trading name of Invicta Financial Services Limited
Registered in England & Wales, Company Number: 05438422
Registered Office: High Weald House, Petteridge Lane, Petteridge, Matfield, Kent TN12 7LT

Authorised and regulated by the Financial Conduct Authority

critical illness cover ● healthcare insurance ● income protection ● life assurance cover ● mortgage protection