



CUSTOMER PRIVACY NOTICE

At Four Oaks Financial Services Limited we respect your privacy and the confidentiality of your personal information.

Who are we?

Four Oaks Financial Services Limited is an appointed representative of Quilter Financial Services Limited and Quilter Mortgage Planning Limited who are part of the Quilter Group of companies.

For further details on the companies in our group, please visit <https://www.quilter.com/about-us/our-brands/>

This Privacy Notice explains:

- Who we are
- What personal information we collect
- How we use your personal information
- Who we share your information with and why
- How we keep your information secure
- Your rights
- How to contact us

Who we are

Four Oaks Financial Services is an appointed representative of Quilter Financial Services Limited {and Quilter Mortgage Planning Limited}

Four Oaks Financial Services Ltd provide financial planning solutions and advice through experienced and qualified advisers based in the UK.

Currently, Four Oaks Financial Services Ltd and Quilter Financial Planning (Quilter) jointly determine the purposes and means of processing personal client data relating to giving advice. This means we're joint data controllers for these core advice giving activities and are, therefore, responsible for managing this client data and ensuring compliance.

However, Four Oaks Financial Services Ltd is solely responsible for some activities, for example any direct marketing that we undertake.

We will comply with relevant data protection law. Such laws require that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

Your rights

Four Oaks Financial Services Ltd tries to be as open as it can be in terms of giving people access to their personal information and, therefore, have outlined your rights below. This privacy notice was drafted with brevity and clarity in mind, therefore further information can be gathered by contacting us using the details below, or more information about your data protection rights can be found here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- The right to be informed – You can request that we provide ‘fair processing information’, typically through this privacy notice
- The right of access - You may request a copy of the personal information we hold about you using the contact details found on the end of this privacy notice
- The right to rectification - The accuracy of your personal information is important to us. You have the right to ask us to update or correct your personal information
- The right to erasure – You may request the deletion or removal of personal data where there’s no compelling reason for its continued processing
- The right to object – You may object to the processing of your data based on legitimate interests
- The right to restrict processing - You have a right to request we ‘block’ or suppress processing of your personal data
- The right to data portability – You may request to obtain and reuse your data; and
- The right not to be subject to automated decision-making including profiling.

If you wish to correct, restrict, delete or make changes to your personal information, or any of the data subject rights listed above, please contact us at the number/address listed below.

Exercising your rights and further information

For information about your individual rights, including how to correct, restrict, delete, make changes to your personal information or if you wish to request a copy of the personal information we hold about you, please contact us by emailing us at QFPDataGuardian@quilter.com

More information about your data protection rights can be found on the [Your data matters | ICO](#) Information Commissioner’s Office (ICO) website, as well as on other regulators’ websites.

If you would like to write to us, our postal address for data protection matters is:

The Office of Data Protection Quilter Financial Planning Senator House 85 Queen Victoria Street
London EC4V 4AB

However, we have adopted a flexible model for working so please note that written communications will take longer to respond to.

What personal information we collect

Personal information includes your name, address, or phone number and other information that isn't otherwise publicly available. We collect personal information about you when you contact us about products and services, visit a financial advisor, visit a website we may have or register to receive one of our newsletters (if applicable).

The type of personal information we collect will depend on the purpose for which it is collected and includes:

- Contact details
- Information to verify your identity
- Family, lifestyle, health and financial information
- Payment details.

We collect personal information directly from you. For example, we ask for personal information at the start of our relationship and in subsequent communications in order to check your identity and protect you from fraud. This is a legal requirement and is important to help safeguard you against potential crime.

Special category information

In some instances, it's necessary to collect more sensitive information (such as health or lifestyle information) which is called special category data. This is to allow us to provide our financial advice service to you. We'll always obtain your consent during the advice process to gather this data and explain what information we require and why it's needed. Sensitive personal information will always be processed and stored securely. You can withdraw your consent at any time to us processing this data, however, this may mean that you can no longer access the service or product the information was gathered for.

Data Retention

We keep your personal information only as long as is necessary for the purpose for which it was collected, or for legal or regulatory reasons. Personal information will be securely disposed of when it is no longer required in accordance with our Personal Data Retention Standard.

Advice data is retained for 50 years to meet our regulatory requirements.

Cookies

We also collect information about you from other sources. For example, our website automatically collects information from your computer using "cookies" which provides us with limited personal information. Cookies are small text files that are placed on your computer by websites that you visit. They're widely used in order to make websites work, or work more efficiently, as well as to provide information to the website owners.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

More information about the cookies we use on our website can be found here:
<https://www.quilterfinancialadvisers.co.uk/cookie-notice/>

How we use your personal information

We process your information to support and maintain our contractual relationship with you and to comply with legal and regulatory requirements. This includes the following:

- Providing our advice, products or services to you
- Carrying out transactions you have requested
- Confirming and verifying your identity for security purposes
- Credit scoring and assessment, and credit management (where applicable)
- Detecting and preventing fraud, crime, money laundering or other malpractice.
- To investigate any complaint or enquiry raised in regards to your adviser or the advice given.

We also process your data for specific business purposes to enable us to give you the best products and services and the best and most secure experience. For example, we process your information to send you marketing that is tailored to your interests.

Our business purposes include the following:

- Enhancing, modifying, and personalizing our services for the benefit of our customers
- Providing communications which we think will be of interest to you
- Market or customer satisfaction research or statistical analysis
- Audit and record keeping purposes
- Enhancing the security of our network and information systems
- Supporting the testing and maintenance of systems

You have the right to object to this processing if you wish, please see "YOUR RIGHTS" section below. Please bear in mind that if you object, this may affect our ability to carry out the tasks above for your benefit.

We may also process your personal data as part of an acquisition or sale. Should this happen, you will be notified about any change to processing or data controller arising as a result of this activity.

Profiling

Profiling involves the use of basic identifiers about you such as your name and address and matching this with information from Experian Marketing Services to create demographics and infer customer 'types'. This helps us define groups based on factors like interests, age, location and more so we can better understand our customers to adapt and improve our products and services. If you would like to know more about the information we get from Experian Marketing Services, you can visit their [Consumer Information Portal | Experian](#) which explains who Experian Marketing Services are, what they do and why.

Lawful basis

We operate under a number of legal bases as required under the regulations. These include:

- Consent;
- Legitimate Interests;
- Performance of a Contract; and
- Compliance with a Legal Obligation.

Who we share your information with and why

We share your information with trusted third parties who perform tasks for us and help us to provide the services you require these include:

- Quilter Financial Planning Limited
- Other adviser firms in the network for the purpose of providing you with advice (with your Consent)
- The Quilter Group of companies to enhance the services and products we can offer you
- Third parties to verify your identity, in line with money laundering or other requirements (this may involve carrying out checks with credit reference databases)
- Third parties who perform tasks for us to help us set up or service your plan (these third parties may be based in countries outside the UK but where they are, we'll undertake an assessment of safeguards in place)
- Other organisations, including regulatory bodies, the police and fraud prevention agencies, to prevent and detect fraud
- Third parties where required by law, court order or regulation
- Third parties as part of an acquisition or sale, and
- The Quilter group or third parties for assurance or audit purpose

How we keep your information secure

We're committed to ensuring the confidentiality of the personal information that we hold, and we continue to review our security controls and related policies and procedures to ensure that your personal information remains secure.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information is kept secure.

If we work with third parties in countries outside the UK, we ensure these are countries that the European Commission has confirmed have an adequate level of protection for personal information, or the organization receiving the personal data has provided adequate safeguards.

In limited circumstances, data may be accessed outside of the UK i.e. by employees when they travel. In these circumstances, we ensure there are appropriate information security measures in place to safeguard your information.

Marketing

You have the right to opt out of marketing information and tell us what your communication preferences are by contacting Quilter Financial Planning using the details provided at the end of this notice, or by using the opt out option below or on any email marketing. You may opt out at any time if you don't want to receive any further communications of this nature.

How to contact us

If you have questions about this notice, need further information about our privacy practices, or wish to give or withdraw consent, exercise preferences or correct your personal information, please contact us using the following details. Quilter will liaise with Four Oaks Financial Services Ltd on your behalf to effect your requests.

The Office of Data Protection, Quilter Financial Planning, 85 Queen Victoria Street, London, EC4V 4AB
QFPDataGuardian@quilter.com

How to complain

If you wish to raise a complaint about how we have handled your personal data, you can contact The Office of Data Protection who will investigate the matter.

If you're not satisfied with our response, or believe we're not processing your personal data in accordance with the law, you can complain to our regulator:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

0303 123 1113

www.ico.org.uk/concerns

Electronic marketing

We may want to send you relevant marketing electronically from time to time. Please notify us if you choose to opt out of this.