

Dear Client,

One of the biggest changes to UK data privacy law, known as GDPR, comes into effect on 25th May 2018.

We are writing to you, as a valued client, to let you know what it's all about and how it will affect working with us in the future.

What is GDPR?

The General Data Protection Regulation (or GDPR for short) is a really positive step towards providing you with even more control over how your data is used, collected, stored, and shared, plus how you're contacted by organisations, including Acorn to Oaks.

In line with these new regulations, we have made some updates. Please see the enclosed Privacy Notice, as well as our GDPR Statement and FAQs.

If you have any questions about these changes please do get in touch with our friendly team on 01902 238190 or email us via ifa@a2ofs.co.uk

Kind regards,

Nina Gupta
Financial Planning Administration Manager

Privacy Notice

Updated 23/04/2018

Who holds your data?

Your information will be held by Acorn to Oaks Financial Services Ltd. FCA No 486131.

To contact our Data Protection Officer, at A2O Financial Services Limited at The Business Hub, Wolverhampton Road, Codsall, South Staffs, WV8 1PX.

Why do we require certain information about you?

We require certain personal information in order for us to manage our relationship with you as a client and fulfil your expectations. The list below shows the data required in order for us to ensure this. Also by storing certain data it allows us to maintain and develop your requirements to ensure best value, which then assists in us being able to run Acorn to Oaks in an efficient and professional manner.

Name – This is a contractual requirement to enable us to identify you and personalise any documents we communicate to you.

Address – This is a contractual requirement so that we can identify you and a form of communication with you.

Date of Birth – This enables us to identify you and ensure that you are eligible for certain products.

E-Mail Address – This is a form of communication so that we can contact you, as well as a form of identification. We use this to communicate with you on information relating to your Policy/ Policies. We will require consent to send marketing to you.

Gender – This is collected for Policy providers

NI Number - This enables us to identify you and is a requirement of Policy Providers.

Telephone Number (Home and/or Mobile) – This is a form of communication so that we can contact you, and also a form of identification.

Bank Details – This is a legitimate interest in order for Policy Providers to collect your premiums if paying by Direct Debit and to pay income into the account, when applicable.

Employer – Some plan types may require these details, ie if companies pay premiums for their employees or allow premiums to be paid via payroll deduction. This is the reason why we may ask for your employer details.

Dependant Details – This is a requirement of Policy Providers.

Existing Policy Details – This is so we can enable we are

Personal Sensitive Details

Type	Reason
Pre-Existing Medical Condition	To establish whether it would be covered on your policy; if applicable.
Medical Condition	To establish whether it would be covered on your policy; if applicable.
Further information from the relevant practitioner/hospital	In some instances, the Policy Provider may require the following consent given by you to contact your practitioner/hospital for further information.

How we use your personal information?

This Privacy Notice is to let you know what personal information Acorn to Oaks holds, how it is looked after, the reason for requiring the information, what is done with it and how long is it kept for.

We use your information to deliver our services, research and find suitable Policies/ Policy Provider for your requirements and to develop and improve our services to you. This Privacy Notice explains how we do this and tells you about your privacy rights and how the law protects you.

Failure to provide the relevant data would mean that we are unable to offer our best service. Here is a list of the ways that we may use your personal information, and which of the legal conditions we rely on to do so.

What we use your Personal data for	Legal Condition	Reasoning
Contact Details are used for communicating	Contractual	To act on your behalf, we need to have your contact details so that we can fulfil your expectations

to you about your policy		and communicate any important information to you.
Contact Details are used for sharing new products/ plans	Consent	We require your consent in order to inform you of new products, services and information on latest plans/ Providers.
Date of Birth	Contractual	We require your date of birth so that we can establish if you are eligible for certain policies, and to verify your identity when discussing your plans with you. It is also a requirement of Policy Providers.

Marketing

We may use your personal information to tell you about relevant products and offers relating to your overall end goal. This is what we mean when we talk about ‘marketing’.

We can only use your personal information to send you marketing messages if we have either your consent or a ‘legitimate interest’. That is when we have a business or commercial reason to use your information to contact you, and it must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time. Please contact us via;

- call us on 01902 238190
- e-mail us at ifa@a2ofs.co.uk
- Write to us at Acorn to Oaks FS Ltd, The Business Hub, Wolverhampton Rd, Codsall, WV8 1PX.

Where do we collect personal information from?

We collect personal information about you from the following sources:

- When you apply for products and services by completing an application form.
- From your employer who is providing a relevant plan for you and they have authorisation to share your data with us.
- When you communicate with us via telephone or e-mail.

How long is the Data Kept For?

We have a Retention Policy and schedule which identifies how long each aspect of

your data should be kept for, with a legal, regulatory and justifiable business needs. We do not keep data for any longer than is required.

Client Data Retention	
Client Records	6 Years after servicing authority ceased
Plan Information	6 Years whilst active policyholder

Updating Personal Data

To the best of our ability we aim to ensure that any personal data we hold is accurate, up to date and correct. We need your help with this; if you don't tell us something has changed we won't know, so please keep us informed.

You can do this by phoning us on 01902 238190 or by writing to us at Acorn to Oaks FS Ltd, The Business Hub, Wolverhampton Rd, Codsall, WV8 1PX.

If we receive a request from you to amend your records, we will take reasonable steps to satisfy ourselves that the data is accurate and to rectify the data if necessary.

Who your data is shared with?

Acorn to Oaks may share your data with regulatory bodies when it is a legal requirement to do so for the purpose of monitoring and enforcing our compliance;

- Financial Ombudsman Service
- Information Commissioners Office
- Fraud prevention agencies

We may also share aspects of your information on occasion with organisations to enable continuity of service, these include;

- Organisations that introduce you to us
- Policy Providers who source your plans

Where is your Data Stored?

All of your data is located in the UK.

We hold your data in hard copy in paper files, in addition some of your information is held electronically in secure systems.

- **Access to your Data**

You have the right to request a copy of all information about you held by Acorn to Oaks. If you would like a copy of some or all your personal data please e-mail ifa@a2ofs.co.uk or write to us at Acorn to Oaks FS Ltd, The Business Hub, Wolverhampton Rd, Codsall, WV8 1PX.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

Regarding marketing, you can ask us to stop sending you marketing messages by contacting us at any time. Please contact us via;

- call us on 01902 238190
- e-mail us at ifa@a2ofs.co.uk
- Write to us at Acorn to Oaks FS Ltd, The Business Hub, Wolverhampton Rd, Codsall, WV8 1PX

- **Right to Complain**

Should you not be happy with the way we handle your personal data, you have the right to complain. Details on how to complain are on our website www.a2ofs.co.uk or you can contact us via ifa@a2ofs.co.uk or write to us at Acorn to Oaks FS Ltd, The Business Hub, Wolverhampton Rd, Codsall, WV8 1PX

Changes to our Privacy Notice

We keep our Privacy Notice under regular review and we will notify you of any updates. The notice was last updated in April 2018.

How to contact us

Please contact us if you have any questions about our Privacy Notice or any information we hold on you;

e-mail ifa@a2ofs.co.uk

Write to us at Acorn to Oaks FS Ltd, The Business Hub, Wolverhampton Rd, Codsall, WV8 1PX

GDPR Statement

Updated 23/04/2018

We are aware of the expectations and obligations set out in the General Data Protection Regulation (GDPR) being implemented on 25th May 2018, and as a result we have a dedicated team working on ensuring that we absolutely meet all of these.

Much of the regulation is based on the existing Data Protection Act, with additions to certain areas such as data subject rights, accountability, and the specific obligations of controllers and processors. We have taken the opportunity to review and amend where required our existing internal processes, including policies, documentation for Policyholders and corporate customers, and working practices, along with communications with our own suppliers and partner organisations.

With the many different strands included in the GDPR, from security, retention, privacy notes and marketing, there are naturally elements currently being worked on, and as part of our commitment to delivering absolute transparency, we shall keep you informed of all and any changes we've made in due course.

Our ultimate objective has, and always will be, to ensure that your data (whether belonging to you, a family member, or an employee) remains secure, in the very safest of hands, and protected, and rest assured that we will continue to operate in accordance with the Data Protection Act and, as of 25th May, GDPR.

If you have any queries or specific questions you'd like to ask, please do get in touch with us.

Kind Regards,

Nina Gupta
Financial Planning Administration Manager

Frequently Asked Questions

What is the General Data Protection Regulation?

The General Data Protection Regulation (or GDPR for short) is the biggest change to UK data privacy law in 20 years. As part of GDPR all companies have to review how they manage all personal data, whether it be customer email addresses, bank details or medical history. But don't worry, it's a really positive step towards you having more control over how your data is used and how you're contacted by companies like us.

How will the changes affect you?

The changes will help us to better protect your data. You'll have greater visibility of the data we hold on you as a client, whether it's something as simple as your name and telephone number, or something as complex and sensitive as your medical information. This means you can have greater confidence that information about you is accurate, up-to-date and properly managed.

(Please see below for changes that affect your organisation, as a corporate customer)

How is Acorn to Oaks complying with the GDPR principles?

We continue to take the security of our client's data extremely seriously, and we welcome the changes needed as a result of these new regulations. We have a small dedicated team to support the changes we need to make as an organisation, and we are taking the time to review all of our policies and procedures to ensure they comply with the new regulations.

What are the key principles of GDPR?

Processing data fairly, lawfully and transparently

This fits very well with the culture of Acorn to Oaks, so it's something we do naturally.

Data Purpose Limitations

We're clear from the outset why we have your personal data, it's to administer your policy/policies, deal with concerns you may have, keep you updated with changes, things that may affect your policy, because it's a contractual obligation.

Data Minimisation

We'll never ask you for (nor do we want) any of your personal data that isn't relevant to the purposes mentioned above. If you're unsure why we're asking for something, feel free to ask us why.

Accuracy

To the best of our ability we aim to ensure that any personal data we hold is accurate, up to date and correct. We need your help with this, if you don't tell us something has changed we won't know, please keep us informed.

Storage Limitations

We have statutory and contractual obligations which we need to meet. Once those have been met there has to be a very good reason why we'd retain records after that time.

Integrity and Confidentiality

We take data security very seriously and have appropriate controls in place to ensure that personal data we hold is secure and only accessed by those that need it to fulfil their role. This includes ensuring that the A2O Team are trained to be vigilant with regards to data security.

Accountability

We take steps to ensure that all A2O staff are aware of their responsibilities regarding Data Protection, including ongoing training on GDPR. As well as this, we have put new measures in place to ensure that we document all decision processes that affect the retention, processing, storage and disposal of all data. One method of doing this is using Privacy Impact Assessments – see below for more information.

Where is data stored?

Our data is stored in the UK with measures in place to ensure data integrity and security.

Working with Acorn to Oaks

How will the changes affect your organisation as a corporate customer?

The changes will help us to better protect your data, and your employee's data, and you'll have greater visibility of the data we hold on you as an organisation.

Your employees will have greater visibility of their data too, whether it's something as simple as their name and telephone number, or something as complex and sensitive as medical information.

This means you can have greater confidence that information about you is accurate, up-to-date and properly managed.

Is A2O a data processor or a data controller?

We are the Data Controller as we determine the purposes for which, and the way that, any personal data are, or are to be, processed.

Does A2O perform Privacy Impact Assessments? (PIAs)

Security and privacy are a core priority at A2O. We undertake risk assessments to our information to ensure we have appropriate controls in place to mitigate any risks highlighted. As part of this risk assessment process we will be carrying out Privacy Impact Assessments to help us get even better at protecting privacy.

How does A2O ensure it meets the Privacy by Design requirements?

At the core of what and how we do things is our clients and in turn their privacy, we'll continue to have a privacy by design approach by utilising Privacy Impact Assessments.

How does A2O handle Subject Access Requests (SAR)?

A2O has an existing Subject Access Request Process but we will be taking the opportunity to make sure this meets the requirements of the new Regulation in due course.

What would A2O do in the unlikely event of a data breach?

With measures already in place, and the changes we are making ahead of the 25th May, we believe we won't have any breaches of data. We haven't had any to date. In the unlikely event that a breach does arise, rest assured we will follow our breach notification process and meet the obligations set out in the Regulation. Should a breach occur and it places any personal identifiable data or any personal sensitive data at risk in any way, then the breach, will be reported to the Information Commissioner's Office (ICO) within 72 hours.

If you have any queries or specific questions you'd like to ask, please do get in touch with us via ifa@a2ofs.co.uk