



## Privacy Statement

ANDREW D'AURIA SOLUTIONS LIMITED (ADS) is an FCA Regulated firm, with an FCA number 781215. In this notice, we state how we process personal data collected about you (collected via your interactions with our online content, such as contact forms and tools, and/or provided directly by you).

Please read this statement carefully to understand why data is being collected and what we do with that data, as by accessing, browsing or otherwise using our [bespoke-ifa.co.uk](http://bespoke-ifa.co.uk) website, you confirm that you have read, understood and agree to the terms of this Privacy Notice and therefore, you agree to the collection and use of your data in accordance with this statement, until further notice or update of your preferences.

Our website and services may contain links to other independent websites. These sites may ask you to provide information to them. Please be aware that such requests and information provided is not under our control, and we are not responsible for the privacy practices of those other sites. We encourage you to be aware when you leave our website to read the privacy statement of each and every website that you enter.

For the purpose of the General Data Protection Regulations 2018 the data controller is ANDREW D'AURIA SOLUTIONS LIMITED Company number 07477648 Registered in England and Wales at office address 144 Walter Road, Swansea, SA1 5RW Regulated by the Financial Conduct Authority under number 781215 for consumer credit broking ONLY.

### **1. What type of information do we collect from you?**

We collect information about you when you register your interest in the use of our Services, such as insurance and mortgage advice. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health – if this is necessary for the provision of our Services. We may also collect information when you voluntarily complete client surveys or provide feedback to us.

The personal information we collect from you will typically include the following:

- Full name and contact details (including your date of birth, contact number, email and postal address).



- Any phone number or email used to get in touch with our Customer Service department and office.
- Information relating to your identity where we are required by law to collect this to comply with the Money Laundering Regulations 2017 and the Immigration Act (such as passport and/or driving license).
- Information on your close connections where we are required to conduct conflicts of interests under regulatory obligations.
- Your banking details as per required when you are applying for Services where your creditworthiness must be evaluated (for example, Services such as mortgage applications).
- Information on any access requirements you have necessary to enable us to find suitable Services for you, which may consist of special category personal data comprising details of any disability or other health information about you (for example, Services such as life protection or insurance).
- Details about your interests where we wish to send you marketing information about similar products and/or Services.

Information relating to the usage of our website is collected using cookies. These are text files stored on your browser that collect standard internet-log and visitor behaviour information. The usage of cookies is no way linked to any personal identifiable information and the cookies are only available while you are navigating online, once you close your browser, the cookies terminate. We'll use your information collected from the website to personalise your repeat visits to the site.

The technical information collected includes:

- Internet Protocol (IP) address used to connect your device to the Internet.
- URL clickstream to and from our site (including date and time).
- Device operating system and platform.
- Device location data (if function is not disabled on your device).
- Browser and plugin types and versions.
- Time zone settings.
- Pages and/or products viewed and/or searched for.



- Time spent on a certain page and page interaction information (such as scrolling, clicks and mouse-overs).
- Methods used to land and exit from the website and/or page.
- Page response times.
- Download errors.
- Communication history between you and our company, including a record of the email, telephone and postal correspondence created
  - a) when you contact us as part of a product or Service query
  - b) during the contractual period of the delivery of Services.

## **2. Why do we need to collect and use your personal data?**

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the Services that you require from us effectively. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

Where special category data is required, we'll obtain your explicit consent in order to collect and process this information.

## **3. How will we use the information about you?**

We will hold and use personal information about you in the following ways:

- To fulfil our obligations to you when providing you with our Services
- To share your information with others where necessary to fulfil our Services for you or where acting as an agent for a third-party on your behalf.
- To comply with our statutory and regulatory obligations, including verifying your identity, prevention of fraud and money laundering and to assess your creditworthiness.
- Communicate with you to provide our Services, for example, enquires and requests.
- Statistical purposes so we can analyse figures to help us manage our business and plan strategically for the future.



- To provide you, or to enable third-parties to provide you, with information about products and Services we feel may interest you: where you have provided permission for us to do so or, if you are an existing customer where we choose to contact you by electronic means (including newsletter and email) with information about our own products and Services, similar to those which you have already obtained from us or negotiated to obtain from us (for those marketing messages you can unsubscribe at any time).
- Track your use of our service, including your navigation of our website in order to improve the website performance and user experience;
- To ensure that content from our website is presented in the most effective manner for you and for your device;
- To notify you about changes to our Service(s).

#### **4. Who might we share your information with?**

*If you agree*, we may email you about other products or Services that we think may be of interest to you. We won't share your information for marketing purposes with any other companies outside of the firm.

In order to deliver our Services to you effectively, we may send your details to third-parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers and life offices that we use to arrange financial products for you.

Where third-parties are involved in processing your data, we'll have a contract in place to ensure the nature and purpose of the processing are clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third-party we'll use appropriate security measures to protect your personal data in transit. To fulfil our obligations in respect of prevention of money laundering and other financial crime we may send your details to third-party agencies for identity verification purposes.

#### **5. How long do we keep hold of your information?**

In principle, your personal data shouldn't be held for longer than is required under the terms of our Contract for Services with you. However, we're subject to regulatory requirements to retain



data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us. In any case, we'll not retain your personal data for longer than 5 years from the end of our regulatory obligations to retain the data.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

#### **6.How can I access the information you hold about me?**

You have the right to request a copy of the information that we hold about you. If you'd like a copy of your personal information, please email or write to us using the contact details noted below.

When your personal data is processed by automated means, you have the right to ask us to move your personal data to another organisation for their use. We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

#### **7.Marketing**

We'd like to send you information about our products and services which may be of interest to you. If you've agreed to receive marketing information, you may opt-out at a later date. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

#### **8.Cookies**

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information on cookies, please visit <http://www.allaboutcookies.org/>. You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.



**9.What can you do if you are unhappy with how your personal data is processed?**

You also have a right to file a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113 (local rate)

**10.Changes to our privacy policy**

ADS may change this policy from time to time by updating this page, so please check this page often to ensure you are happy with any changes. This privacy notice was last updated on .....

**11.How to contact us**

Please contact us if you have any queries about our privacy terms or information, we hold about you:

By email  
ANDREW D'AURIA SOLUTIONS LIMITED  
[Info@ADS-Wales.co.uk](mailto:Info@ADS-Wales.co.uk)