

Data Protection Statement

As part of our arrangement with you, The Investment Coach Limited (“we”, “us”, or “our”) has certain obligations under privacy laws, including the Data Protection Act (the “Act”) to notify individuals how it will process any personal information it collects about them. This Notice will inform you of what personal information we collect, how that information is used, where it is transferred, and how you may view and amend such information. You may be assured that we will treat all personal information as confidential and will not process it other than for a legitimate purpose. Steps will be taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary. Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to the information.

What type of personal information will be processed?

We collect and process various personal data about you for the purposes of providing advice, administration and management services which are explained in more detail below. “**Processing**” is defined in the Act but could include obtaining, recording or holding information or data. “**Personal data**” is information which can identify you as a living individual, including where used in conjunction with other information. Common examples of personal data which may be collected and used by us in our day to day business activities include:

- name;
- date of birth;
- gender;
- ethnicity;
- marital status;
- address;
- telephone number and other contact details (including email addresses);
- job title; and
- bank account and other financial details.

Depending upon the types of products and services you require, the information collected and processed may also contain “**sensitive personal data**” for the purposes of the Act, which includes information held by us as to:

- your physical or mental health or condition;
- the commission or alleged commission of any offence by you;
- any proceedings for an offence committed or alleged to have been committed by you, including the outcome or sentence in such proceedings;
- sexual life;
- in limited circumstances, your membership of a Trade Union;
- your political opinions, religious or similar beliefs

Any information which we receive fairly and lawfully relating to one of the above categories constitutes sensitive personal data. Examples of likely items which may contain sensitive personal data (although this is not an exhaustive list) are life insurance questionnaires, medical reports and SSP self-certification forms.

Please note that as with personal data, you have freedom of choice when it comes to your decision as to whether you provide us sensitive personal data. In addition to your right to request that we stop processing your personal data and sensitive personal data at any time, you have an opportunity at the end of this Notice to choose not to provide sensitive personal data to us at all. **You should however note that if you exercise this right or subsequently request that we stop processing all or part of your personal data and/or sensitive personal data, this could impact upon our ability to provide you with certain types of product and services and may ultimately result in us being unable to provide them to you at all.**

How will my personal data be collected and used?

We collect personal data from you to the extent necessary to provide advice, administrative and management services and (subject to the provisions below), related marketing activities.

We may process your personal data and sensitive personal data for the following reasons:

- The administration, management and provision of advice in relation to financial services products;
- Our legitimate business processes and activities including internal audit, accounting, business planning and proposed and actual transactions (including joint ventures and disposals of business); and
- Compliance with legal (including dealing with claims), regulatory and other good governance obligations;

This list is not exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal data that we maintain will be kept in paper files, while other personal data will be included in computerized files and electronic databases.

The Investment Coach Limited will comply with the Data Protection Act and ensure that the data held is kept securely and confidentially. There is a disaster recovery procedure in place to ensure that important data is safeguarded.

The Investment Coach Limited, Product Providers, Lenders and Investment Managers may administer your policy, any existing policies you may have with them and provide other services, from centres in countries outside Europe, that do not always have the same standard of data Protection laws as the UK. However, they are required to ensure that your information is adequately protected, and they will remain bound by their obligations under the Data Protection Act even when your personal information is processed outside Europe.

Who might my personal data be shared with?

Your personal data will be made available for the purposes mentioned above and only to responsible management, human resources, accounting, audit, compliance, information technology and other corporate staff. It may also be made available to third parties providing relevant services to us who provide us with certain support services, including regulatory support. You can ask us for our current list of business support providers.

Certain personal data will also be reported to government authorities where required by law and for tax or other purposes. Personal data may also be released to external parties as required by legislation, or by legal process, as well as to companies you authorise us to release your personal data to. We will not sell your personal data to any third party.

Direct marketing

We may wish to provide you with information about new products, services, promotions, and other information in which we think you may be interested. We may send you such information by postal mail, fax and telephone; unless you have registered with the appropriate Preference Service (we would be grateful if you could let us know if this is the case). If you purchase a product from us we may retain your address for future mailings. If you do not want your information used for direct marketing purposes at any time, please contact us by e-mail at dataprot@theinvestmentcoach.co.uk or by telephone on 01933 315698 to let us know and we will not send you any direct marketing.

E-mail marketing

We would also like to provide you with the above information by e-mail. However, we appreciate that e-mail "spam" has become a problem in recent years. If you are a customer or you have previously asked us for information on our products:

- We may contact you regarding your purchase or other matters regarding transactions between us, or your customer relationship with us, or send you information on our products by e-mail, unless you have asked us not to do so; and
- We may also use your e-mail address to send you information about our products and services that we think may be of interest to you by way of informational e-mails, unless you have asked us not to do so.

A consent statement is provided at the end of this form for you to indicate your preference to receive e-mail marketing. If you decide at any time that you no longer wish to receive marketing e-mails from us, please email us at dataprot@theinvestmentcoach.co.uk You can also unsubscribe directly from any marketing e-mail that we send.

ID Checks

We are required by Law to verify the identity of all our clients. Business cannot be transacted until verification is complete. We use electronic money laundering checks. The searches are conducted at

our request in respect of a transaction, or proposed transactions, and are purely for the purpose of verifying identity and not a credit check. This is a requirement placed on many organisations that need to comply with legislation pertaining to Anti Money Laundering regulations.

Money laundering (ML) searches do not have an impact on an individual's credit file and would not be seen by a company performing a credit check. Only a company doing another money laundering search would see other ML searches on the individual.

Please note that the firm's legal obligations under the UK's anti money laundering regulations require us in all cases to process personal data for the purposes of preventing money laundering. This means in relevant circumstances your data may have to be released to national crime prevention authorities.

Website cookies and other tracking technologies

Some of our web pages utilise "cookies" and other tracking technologies. A "cookie" is a small text file that may be used, for example, to collect information about web site activity. Some cookies and other technologies may serve to recall Personal Information previously indicated by a web user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them.

You may set most browsers to notify you if you receive a cookie or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter your original user ID and password to gain access to certain parts of the web site. Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our site is accessed.

Our use of cookies and other tracking technologies allows us to improve our web site and your web experience. We may also analyse information that does not contain Personal Information for trends and statistics.

By using our website (theinvestmentcoach.co.uk), you consent to the terms of our Online Privacy Policy (which can be found under "Cookies" as a link at the bottom of our home page) and to our processing of Personal Information for the purposes of providing our service to you as well as those explained where we request Personal Information on the website.

Your right to review and amend personal data

You have the right to review your personal data and sensitive personal data held by us and have any inaccurate information about you corrected. If you wish to do so, or to notify a change in your details, please contact The Data Protection Officer on 01933 315698 or in writing at The Investment Coach Limited, Manor Farm, Wymington Road, Podington, Wellingborough, Northamptonshire NN29 7HP. You may be charged a fee (subject to the statutory maximum) for supplying you with such data.