

PRIVACY NOTICE

As the operators of the website www.hamblinmartinfinancial.co.uk Hamblin-Martin Financial Limited of Bulrushes Farm, Coombe Hill Road, East Grinstead, West Sussex. RH19 4LZ is committed to protecting and respecting your privacy. This Privacy and Cookies Policy (together with and any other documents referred to therein) sets out the basis on which the personal data collected from you, or that you provide to us will be processed by Hamblin-Martin Financial Ltd. Please read the following carefully to understand our views and practices regarding your personal data and how Hamblin-Martin Financial Ltd will treat it.

For the purpose of the General Data Protection Regulation ("GDPR", from the GDPR implementation date, the Data Protection Act 1998, (collectively the "Data Protection Laws") the Data Controller is the Compliance Director at Best Practice IFA Group Ltd.

YOUR PERSONAL INFORMATION

Information we collect from you

We collect and process some or all of the following types of information from you in the course of providing our services.

* Information that you provide by completion of our fact find and other information gathering, all form part of our registration process. This includes information provided at the time of subscribing to our services. We may also ask you for further information regarding additional and ongoing services.

* Specifically, personal details such as name, address, date of birth, contact details such as telephone number and email address, or any information input when using our website, completing our documentation and using our services.

* If you contact us, we may keep a record of that correspondence.

* We may also ask you to complete client satisfaction surveys that we use for research purposes, although you do not have to respond to them.

* Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.

The provision of your name, address and date of birth, as well as other personal data is required from you to enable Hamblin-Martin Financial Ltd to fulfil our regulatory and legal obligations. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

Information we collect from other sources:

Where Hamblin-Martin Financial Ltd have received your personal data from other sources, for example a professional introducer, the professional introducer should have sought your permission to share your personal data with us, prior to making any contact with Hamblin-Martin Financial Ltd. We will only use this data to make our initial contact with you, this does not affect your statutory rights and you are within your rights to request for us to make no further contact with you and to delete your data held by us.

USES MADE OF YOUR INFORMATION

Lawful basis for processing

We rely on your consent as provided when you sign up to using our Services as the lawful basis on which Hamblin-Martin Financial Ltd collect and use your personal data. Our legitimate interests in this data are to fulfil our contractual obligations to you and to fulfil our legal obligations as authorised and regulated firms.

Purposes of processing

We use information held about you in the following ways:

- * To provide you with our services.
- * To ensure that content on the Website is presented in the most effective manner for you and for the device(s) you use to access and view the Website;
- * To provide you with information and offers that you request from Hamblin-Martin Financial Ltd or which we feel may interest you.
- * To carry out our obligations arising from any contracts entered into between you and Hamblin-Martin Financial Ltd.
- * To allow you to participate in interactive features of our service, when you choose to do so.
- * To notify you about changes to our service.

Marketing

In addition to the above uses Hamblin-Martin Financial Ltd may use your information to notify you about goods or services which may be of interest to you. Where Hamblin-Martin Financial Ltd do this, we will contact you by electronic means (e-mail or SMS) only if you have consented to such communication. If you do not want Hamblin-Martin Financial Ltd to use your data in this way please either (i) tick the relevant box situated on your Service Charter on which we collect your data; (ii) unsubscribe from our electronic communications using the method indicated in the relevant communication; or (iii) inform us at any time by contacting us at the contact details set out below.

DISCLOSURE OF YOUR INFORMATION

We routinely disclose your personal data to third parties as follows:

- * We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to host our servers).

We may disclose your personal data to any member of our corporate group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (where applicable).

We may also disclose your personal data to third parties:

- * in the event that Hamblin-Martin Financial Ltd merge with, sell or buy any business or assets - in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or

* if Hamblin-Martin Financial Ltd or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; or

* if Hamblin-Martin Financial Ltd are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our client agreement/service charter; or

* to protect our rights, property, or safety or that of our affiliated entities and our users and any third party we interact with the to provide the Website; or

* in relation to selected third parties only, only to the extent that you have consented to such selected third parties notifying you about certain goods or services, which may be if interest to you.

Other than as set out above and save insofar as is necessary in order for Hamblin-Martin Financial Ltd to carry out our obligations arising from any contracts entered into between you and us, Hamblin-Martin Financial Ltd will not share your data with third parties unless we have procured your express consent to do so.

STORING YOUR PERSONAL DATA

Security

Hamblin-Martin Financial Ltd take appropriate measures to ensure that any personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. Hamblin-Martin Financial Ltd limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Hamblin-Martin Financial Ltd also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although Hamblin-Martin Financial Ltd will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

Keeping your personal data up to date

If your personal details change you may update them by accessing this data through the Wealth Platform portal, or by contacting us using the contact details below. If you have any questions about how Hamblin-Martin Financial Ltd use data collected which relates to you, please contact us by sending a request email to info@hamblinmartinfinancial.co.uk.

We will endeavour to update your personal data within seven working days of any new or updated personal data being provided to us, in order to ensure that the personal data Hamblin-Martin Financial Ltd hold about you is as accurate and up to date as possible.

How long we keep your personal data

* Hamblin-Martin Financial Ltd will hold personal data (e.g. name, address, date of birth and contact details) in line with our regulatory and legal obligations as set out by our regulator – currently a minimum of five years for investment business and indefinitely for occupational pension transfer or opt-out business.

Where we store your personal data

All of the information that Hamblin-Martin Financial Ltd hold about you is stored on our secure servers within the EEA.

If you would like further information please contact Hamblin-Martin Financial Ltd or the Compliance Director at Best Practice IFA Group Limited, of which we are an Appointed Representative (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom OR EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

YOUR RIGHTS

Under the General Data Protection Regulation, you have a number of important rights free of charge. In summary, those include rights to:

- * access to your personal data and to certain other supplementary information that this Policy is already designed to address
- * require us to correct any mistakes in your information which we hold
- * require the erasure of personal data concerning you in certain situations
- * receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- * object at any time to processing of personal data concerning you for direct marketing
- * object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- * object in certain other situations to our continued processing of your personal data
- * otherwise restrict our processing of your personal data in certain circumstances
- * claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- * email, call or write to Hamblin-Martin Financial Ltd or our Compliance Director at Best Practice IFA Group Limited
- * let Hamblin-Martin Financial Ltd have enough information to identify you e.g. account number, username and any registration details

* let Hamblin-Martin Financial Ltd have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and

* let Hamblin-Martin Financial Ltd know the information to which your request relates including any account or reference numbers, if you have them

HOW TO COMPLAIN

We hope that Hamblin-Martin Financial Ltd or our Compliance Director can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Policy at any time. Any changes We may make to our Policy in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy policy.

INFORMATION ABOUT OUR USE OF COOKIES AND IP ADDRESSES

Hamblin-Martin Financial Ltd may collect information about your mobile phone, computer or other device from which you access the Website, including where available your IP address, operating system and browser type, for systems administration and to report aggregate information to third parties' affiliates. This is statistical data about our users' browsing actions and patterns and does not identify any individual. Hamblin-Martin Financial Ltd may, however, use such information in conjunction with the data we have about you to track your usage of our services.

Our Website uses cookies to distinguish you from other users of our Website. This helps Hamblin-Martin Financial Ltd to provide you with a good experience when you browse our Website and also allows us to improve the Website. By using our Website, you agree to our use of cookies as more specifically set out below.

A cookie is a small file of letters and numbers that Hamblin-Martin Financial Ltd store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies we use include:

* "Analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.

* "Strictly necessary" cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.

* "Functionality" cookies. These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

* "Targeting" cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed to our affiliate's websites. We will use this information to make our

Website, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties' affiliates may also use cookies, over which We have no control.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our Website.

CONTACT

All questions, comments and requests regarding this Privacy and Cookies Policy should be addressed to Barry Hamblin, Managing Director at Hamblin-Martin Financial Ltd of Bulrushes Farm, Coombe Hill Road, East Grinstead, West Sussex. RH19 4LZ, or alternatively please contact our Compliance Director at Best Practice IFA Group Ltd, Broadlands Business Campus, Langhurstwood Road, Horsham, West Sussex, RH12 4QP, telephone 01403 334455.