Big Picture Financial Planning Ltd is an independent financial adviser delivering Chartered Financial Planning and advice on financial products to our clients. This is not delivered via the website, which exists to showcase our services and to reach out to new and existing clients who benefit from our services.

At Big Picture Financial Planning Ltd we respect your privacy and are committed to protecting the confidentiality of your personal information. In doing so we follow the requirements of the UK General Data Protection Regulation (UK GDPR) this follows on from the European privacy law that took effect on May 25, 2018 and has been retained by the UK government, following the UK's exit from the European Economic Union. It sets forth rules governing how companies may collect, store, and use personal data pertaining to and/or originating from individuals in the UK and the EEU.

We welcome the transparency this provides our website visitors and this privacy notice lets you know the data we may collect, why and how we process it, how long we keep it for, who we may be sharing it with and how to exercise your rights over your data.

Our contact details are:

Big Picture Financial Planning Ltd Registered Address: The Electric Works, Sheffield Digital Campus, 3 Concourse Way, Sheffield S1 2BJ Phone Number: 0345 250 1271 E-mail: enquiries@bigpicturefp.co.uk

## The type of personal information we may collect from you

Through the website we may collect and process the following:

- Information that you provide us by completing our online forms, subscribing to our newsletter or registering for any service that we might provide. For example, name, contact details, data that is known as personal identifiers that could be used to identify a living person.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data and the other resources you access.

We are not interested in gathering sensitive personal data through the website and prefer to limit the amount of personal data, to that which you chose to provide on any of the online forms. Should you go on to become a client of ours we will need to gather a lot more information in order to advise you and details and processing of the information we collect at this stage is covered in our retail client agreement and client privacy notice.

# How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

You will have completed an online enquiry form or a newsletter subscription or another request for information. We collect just enough personal information to enable effective communication with you.

We use the information that you have given us in order to respond to your enquiry or request for information. Where you have given your consent to receiving marketing promotional material we will keep your email on our newsletter mailing list so that you can be kept informed of news and market events. You can unsubscribe at any time. We do not share your information with other organisations or individuals.

Cookie	Classification	Description
is_mobile	Functionality cookie	These cookies enable us to remember you have used our Services before, preferences you may have indicated and information you have provided to us to give you a customised experience.
sto-id-editor	Functionality cookie	As above
Sto-id-pages	Functionality cookie	As above
Sp	Performance and Analytical cookies	This information is used to make sure our Services can cope with the volume of users, to help us correct errors in the Services and to measure use across our Services. These cookies help us understand if you have used our Services before so we can identify the number of unique users we receive. They also help us understand how long you spend using our Services and from where you have accessed the Services, so that we can improve the Services and learn about the most popular aspects of the Services.
_snow_ses.1cf4	As above	As above
_snow_id.1cf4	As above	As above
snowplowOutQueue_snow daywn_post2	As above	As above

Our website provider has set up the following cookies on our website.

Our website uses cookies to collect details of your site visits and the resources that you access which is presented in daily and weekly statistics which shows us the number of unique visitors and page views. This is so we can assess the performance of our website and how visitors use our website. This is statistical information only about our visitors browsing patterns and does not identify any individual.

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. If you don't want cookies stored on your machine you can adjust your settings in your browser or use a cookie blocker.

Cookies cannot be used by themselves to identify you. We don't you require you to login or register to use our website.

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information are:

Your consent. You are able to remove your consent at any time. You can do this by contacting the data controller at Big Picture Financial Planning

This is limited and applies only to data gathered from our website as part of our communications and marketing to new clients and the provision of pertinent/relevant information to our existing clients.

We will not share or pass your information to any other third party.

Should you become a client the type of data we gather and our lawful basis for this will be covered in our Retail Client Agreement which includes our Retail Client Privacy Notice.

#### How we store your personal information

Your information is securely stored on the website server that is outside the UK. Your data may be processed by staff working for the website server in the fulfilment of their duties in providing us with support and administration services and may not use it for any other purpose. By submitting your personal data, you agree to this transfer, storing or processing.

Transfer of information via the internet is not completely secure and whilst we have systems and security checks in place for the security of your data transmitted to our site, any transmission is at your own risk.

## Your data protection rights

We keep enquiry information for a period of one year, or three years if further details have been submitted. We will then dispose of your information by deleting information from our servers and cross shredding any paper documents.

Our website is only concerned with communications and marketing and you can withdraw your consent at anytime or unsubscribe from any newsletters at anytime. We will not be processing or storing any personal information on any other lawful basis other than consent.

However, should you become a client to whom we have given advice or recommended a regulated financial product, in the performance of our duties as a financial adviser, we are obliged to keep your information indefinitely, which we do so securely using the following: Iress XPlan CRM system Google Drive ICloud

In which case the lawful basis under which we will be processing your personal data will be different and your rights under data protection law including access, rectification, erasure, restriction of processing, objection and portability will be documented in the Retail Client Agreement and Retail Privacy Notice.

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you wish to make a request please contact us: Big Picture Financial Planning Ltd The Electric Works Sheffield S1 2BJ enquiries@bigpicturefp.co.uk

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [Insert your organisation's contact details for data protection queries]. You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:

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

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk Tell people how to make a complaint to you here. Include the ICO's address.