

# PRIVACY AND COOKIE POLICY

At clarity Ltd. we are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about people who visit our website or seek our services, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this policy from time to time so please check the webpage occasionally to ensure that you're happy with any changes. By using our website and/or our advisory services, you're agreeing to be bound by this policy.

## HOW TO CONTACT US?

Any questions regarding how we collect, store or process data should be sent by email to [enquiries@clarityglobal.com](mailto:enquiries@clarityglobal.com) or by post to:

The Data Protection Officer  
clarity Ltd 1 Crown Square  
Woking  
Surrey  
GU21 6HR

Alternatively, you can contact us by telephone on **0800 368 7511**.

## WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

If you are visiting our website the personal information, we collect might include your name, address, email address, IP address, investment policy details you personally enter and information regarding what pages are accessed and when.

If you are seeking advice, or other services from us we will undertake a getting to know you process. This will include obtaining information about your personal and financial circumstances and objectives. Where you have investments or policies we will obtain information on these either from you, or upon consent from you directly from the providers concerned. We will assess your Attitude to Risk and Capacity for Loss and record this in our documentation. We will retain records of any investments, or policies that you arrange through us.

In addition, we will hold Information you may provide us about other people e.g. joint applicants, or beneficiaries for products you have with us.

Where we are providing an ongoing service, we will update the information as part of our review process and note our records.

## HOW DO WE COLLECT INFORMATION FROM YOU?

We obtain information about you when you use our website, and if you seek our advice or other services.

We collect information in a number of ways:

- Through website forms on which the user knowingly enters information, such as on our newsletter request, registration and information request forms on our Websites.
- Through user entry of data in our Services.
- Through automated collection of information from our Websites and Services such as referring web pages, search terms, pages visited, the user's and organisation's IP addresses, Google Apps Domain information and email addresses.
- We also collect information provided to us over the phone, by email, in writing and in person.

provide it we may not be able to continue to advise you.

There may be situations where the information we require is a special category of personal data under the legislation. In this case we will explain why we need it and obtain your consent to obtain the data. This situation most commonly occurs where we are arranging life assurance products and need to obtain medical information from you.

## HOW IS YOUR INFORMATION USED?

**We store information in three ways:**

- In website databases and log files (for web submissions).
- In databases to manage, operate and administer our Services.
- In our CRM and Support databases.

**We will use your information to:**

- Act as the basis for any advice we provide
- Carry out our obligations arising from any contracts entered into by you and us;
- Provide information to investment providers or life assurance firms for the purposes of arranging products and services for you;
- Provide our ongoing service to you.
- Meet our regulatory obligations in the services we provide to you.
- We may also aggregate customer data to produce and or publish statistical reports, however such reports will be produced so that individuals cannot be identified.

## HOW LONG IS INFORMATION RETAINED?

We are required by legislation and the Financial Conduct Authority (FCA) to retain records for specified periods. These vary dependent upon the nature of the service provided.

## WHO HAS ACCESS TO YOUR INFORMATION?

We do not share personally identifiable information with third parties other than with our primary business partners, and this is solely as necessary to provide the information or services you have requested.

We will never sell or rent your information to third parties.

We will never share your information with third parties for marketing purposes.

## THIRD PARTY SERVICE PROVIDERS WORKING ON OUR BEHALF

We may pass your information to our third-party service providers (including investment houses and life assurance firms), agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, such as paraplanning and compliance support. Where we use third-party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. Please be reassured that we will never release your information to third parties beyond the firm for them to use for their own purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

## CONTACTING YOU

We will make appropriate contact with you to provide the agreed services. Where this includes our ongoing advisory services, we will contact you at the agreed intervals to undertake our review. We may also contact you at other times if we believe you need to take action (e.g. if you should consider making ISA or pension contributions before tax year end) or be aware of changes in the economic situation. These communications form a core part of clarity's service.

We will only contact you for marketing purposes where you have given your prior consent for us to do so or, on occasion, where we believe you may have a legitimate interest in the information we are providing. You can change your marketing preferences at any time in your clarityONLINE account, by post or by emailing:

[adminteam@clarityglobal.com](mailto:adminteam@clarityglobal.com).

## YOUR RIGHTS IN RELATION TO YOUR INFORMATION

The accuracy of your information is important to us. Where we provide just an initial advice service, the information will reflect your situation at that time and we will not normally update this (apart from a change of contact information). Where we are providing an ongoing service, we will update the information as appropriate when we undertake a review with you. If between reviews, you change your contact information please notify us and we will update our records.

Under new EU requirements you have a number of specific rights, these are summarised below:

### Access

You have the right at any time to request a copy of the personal information we hold about you. Should you wish to receive a copy of this, please contact our administrative team at our Woking address, or by using the email [adminteam@clarityglobal.com](mailto:adminteam@clarityglobal.com).

Our security procedures mean that we may request proof of identity before we reveal that information to you.

We will provide this within one month of request receipt, free of charge (we may charge a fee for subsequent or duplicate requests).

### Rectification

You may ask us to correct any information which we hold that is inaccurate or incomplete.

### Erasure

You may ask us to delete or cease processing data in certain situations. Please note that where we have regulatory obligations to retain information for certain time periods, we will retain such information as we believe is necessary to fulfil these obligations.

### Restricting Processing

You may ask us to cease processing information. This means that we will be able to retain it but no longer act upon it. In the event that you no longer need our services and terminate them we will automatically cease processing information.

### Portability

You may have the right to have your data transferred to another service provider in an appropriate electronic format. Please note that we will have regulatory obligations to retain copies of the information as outlined previously.

### Objection

You have the right to object to us using information for marketing purposes and may have the right to object to us processing information.

This is a brief summary of your rights and there may be restrictions on some of them. If you wish to explore any of these rights at any time, please contact us on the addresses above and we will be pleased to assist you.

## SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION

When you give us personal information, we take steps to ensure that it is retained securely and processed in a confidential manner. We will ensure that it is held in accordance with the Data Protection Act 1998. Your information may be accessed by your adviser and our support staff for the purposes of providing our services to you. In addition, it may be accessed by senior managers and our compliance consultants (or the FCA) for the purposes of ensuring compliance with our regulatory obligations and reviewing the quality of our advice.

Once we receive your information, we make our best effort to ensure its security on our systems. Our security controls are aligned to industry standards and good practice. All employees are trained (and undertake annual refresher training) in storing and transmitting client information. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites or documents, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

As mentioned above, we take privacy very seriously and are committed to the following:

### **Educating You on Web Tracking and How to Avoid Web Tracking**

Our web-tracking solution uses a first party cookie to track visitor activity on our web sites. We use this information to improve the content of our sites as well as to provide visitors with a more relevant overall experience with our organization and our site. As mentioned earlier, we never share information you provide us with third parties. If you do not want our site to place a cookie on your browser and track your activity you may leave the site, or you may browse the site using privacy mode in your web browser. To learn how to use privacy mode refer to manuals online depending on the browser you use.

If you fill out a web form on our site your information will be stored in our CRM or support systems and some amount of your past browsing on this site may be available to our staff to determine your interests so we may more effectively engage with you and so we may improve our site. However, if you use private browsing as described above, you may provide us your information without making your past browsing activity available to us.

### **Using Only Permission Based Web Tracking Technologies**

We use first party HTML browser cookies in our web tracking technology. This means that visitors to our site are easily able to set their browsers to reject cookies and are easily able to delete cookies set by us and others. For example, to set the Internet Explorer browser to reject cookies go to Tools > Internet Options > Privacy > Settings and select the privacy level (using the slider bar) that you prefer. To delete cookies in Internet Explorer, go to Tools > Internet Options > General > Browsing History and click the Delete button then select the cookies option.

We never use visitor identification techniques that involve sharing information you provide us with other sites, or vice versa.

## USE OF 'COOKIES'

Like many other websites, the clarity Ltd website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

clarity Limited uses cookies for form field memory, login, and other site customizations and for statistical purposes related to website administration, usage and customer interactions.

Our Websites and Services also use Google Analytics to analyse the use of the websites and generate statistical and other information about website use by means of cookies, which are stored on users' computers.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

## LINKS TO OTHER WEBSITES

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites, even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

## RIGHT TO COMPLAIN

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please write to us at our Woking administrative office or email us at [enquiries@clarityglobal.com](mailto:enquiries@clarityglobal.com).

If you are still unhappy with any dealings with us regarding your personal information you may complain to the Information Commissioners Office (ICO). You can do this via their [website](#), or by calling **0303 123 1113**.

## REVIEW OF PRIVACY POLICY AND PRACTICES

We keep this Policy under regular review. This Policy was last updated in January 2025.