Privacy Notice

Who We Are

Burley Fox Limited *('we' or 'us' or 'our')* is committed to protecting and respecting your privacy.

This Privacy Notice explains how we collect, use, store and protect your personal information when providing financial planning, wealth management and related services. It also explains your rights under UK data protection law.

Burley Fox Limited is registered in England and Wales under company number **08644340**, and our registered office is:

Burley Fox Limited
20 Cathedral Road
Cardiff
CF11 9LJ

We are registered with the Information Commissioner's Office (ICO) under registration number **ZA026984**. Depending on the nature of the services provided and the purpose of the processing, Burley Fox Limited may act as either a Data Controller or a Data Processor in accordance with UK data protection legislation.

Our designated Data Protection Officer for the organisation is Paul Fox, and we can be contacted by telephone or e-mail as well as by post:

Telephone: **029 2167 9770**
E-mail: **paul.fox@burleyfox.com**

As an FCA-regulated financial advisory firm, we are required to collect and process certain personal information to provide our services, meet regulatory obligations and maintain appropriate business records.

This Privacy Notice applies to clients, prospective clients, employees, job applicants, contractors and other individuals whose personal information Burley Fox Limited processes.

Lawful basis for processing personal data

We process your personal data only where we have a lawful basis to do so under the UK General Data Protection Regulation and the Data Protection Act 2018. Depending on the purpose, we rely on the following lawful bases:

- **Performance of a contract:** where processing is necessary to provide financial advice, arrange or administer financial products and services, communicate with you, or take steps at your request before entering into an agreement.

- **Compliance with a legal obligation:** where processing is necessary for us to comply with obligations applying to an FCA-authorised firm, including applicable requirements under the Financial Services and Markets Act 2000, FCA rules and guidance, anti-money laundering and counter-terrorist financing legislation, fraud prevention requirements, tax and accounting obligations, and requests from competent regulatory or law-enforcement authorities.

- **Legitimate interests:** where processing is necessary for our legitimate business interests, such as managing our business and client relationships, maintaining records, improving our services, information security, preventing fraud, handling complaints and defending or establishing legal claims. We will only rely on this basis where our interests are not overridden by your rights and freedoms.

- **Consent:** where consent is required by law or where we choose to rely on consent, including certain forms of electronic marketing or the processing of particular types of sensitive personal data. Where we rely on consent, you may withdraw it at any time. Withdrawal will not affect processing carried out before consent was withdrawn.

Where we process special category data, such as health information, we will also identify and rely on an additional condition under Article 9 of the UK GDPR, where applicable. We will not use consent as a substitute for another more appropriate lawful basis, and we will document the lawful basis relied upon for each processing activity.

Information That We Collect

To provide financial planning, wealth management and related services, we may collect and process personal information about you.

The types of information we collect may include (not an exhaustive list):

Category	Examples
Identity	Name, date of birth, national insurance number, passport details, driving licence details and other identification documents
Contact Data	Home address, telephone numbers and email addresses
Family and Personal Data	Marital status, dependants, beneficiaries and family circumstances where relevant to the services we provide
Financial Data	Income, expenditure, assets, liabilities, savings, investments, pensions and other financial information
Employment Data	Employment status, occupation, remuneration and employment benefits, credit searches, criminal bureau searches, right to work / remain searches, passports, Former Employer References
Special Category Data	Health or medical information and other special category data where required to provide advice or meet legal and regulatory obligations
Risk Profile Information	Investment objectives, attitude to risk, capacity for loss and other suitability information

The personal information we collect will vary depending on the nature of the services we provide and our legal and regulatory obligations.

Where necessary, we may also collect information required to verify your identity, prevent financial crime, comply with anti-money laundering legislation and fulfil our regulatory obligations.

How we collect information: -

- Meeting with a Burley Fox Adviser (*i.e. face to face, telephone, email, or video conference, etc.*)
- From third parties with your explicit consent (*i.e. Employers, Professional Advisers, Life Offices, Pension Scheme Administrators, Investment Managers, etc.*)
- From your Employer where we are the advisers/agents for Employee Benefit Schemes
- References from previous Employers
- Electronic downloads from providers where we are already your adviser
- Online/Website Forms
- Employment CV's
- Online verification sources

How We Use Your Personal Data

We only process personal information where we have a lawful basis to do so and where the processing is necessary to provide our services, comply with legal and regulatory obligations, or support the legitimate operation of our business.

We may use your personal information for the following purposes:

Purpose of Processing	Lawful Basis
Providing financial planning, wealth management and related services	Contract
Assessing your financial circumstances, objectives and suitability for advice	Contract
Verifying your identity and carrying out anti-money laundering checks	Legal Obligation
Meeting our regulatory and compliance obligations, including FCA requirements	Legal Obligation
Maintaining client records and business records	Legal Obligation and Legitimate Interests
Communicating with you about our services and ongoing advice arrangements	Contract and Legitimate Interests
Managing complaints, disputes and legal claims	Legal Obligation and Legitimate Interests
Protecting our business, systems and clients from fraud, financial crime and security threats	Legal Obligation and Legitimate Interests
Sending marketing communications where required permission has been provided	Consent

We may also send educational, regulatory or service-related communications to clients where these form part of our ongoing client relationship.

International Transfers

Some service providers used by Burley Fox Limited may process personal information outside the United Kingdom. Where this occurs, appropriate safeguards will be implemented to protect personal data in accordance with UK data protection legislation.

Marketing Communications

Where you have provided your consent, we may contact you with information about our services, publications or other matters that may be of interest to you.

You can withdraw your consent or unsubscribe from marketing communications at any time by contacting us using the details provided in this Privacy Notice.

Your Rights

Under UK data protection law, you have a number of rights regarding the personal information we hold about you. These rights include:

Right	Description
Right of Access	To request a copy of the personal information we hold about you.
Right to Rectification	To ask us to correct inaccurate or incomplete personal information.
Right to Erasure	To request the deletion of personal information in certain circumstances.
Right to Restrict Processing	To ask us to limit how we use your personal information in certain circumstances.
Right to Object	To object to the processing of your personal information where we rely on legitimate interests as our lawful basis.
Right to Data Portability	To request that certain personal information is provided in a commonly used electronic format or transferred to another organisation where appropriate.
Right to Withdraw Consent	Where processing is based on your consent, you may withdraw that consent at any time.

To exercise any of these rights, please contact us using the details provided in this Privacy Notice.

To protect your personal information, we may ask you to verify your identity before responding to your request.

Complaints

If you are unhappy with how we process your personal information, we would ask that you contact us first so that we can investigate and address your concerns.

If you still remain dissatisfied with how we have processed your personal information, you also have the right to lodge a complaint with the Information Commissioner's Office.

Paul Fox - Data Protection Officer
Burley Fox Limited
20 Cathedral Road
Cardiff
CF11 9LJ

Telephone: 029 2167 9770
E-mail: paul.fox@burleyfox.com

Information Commissioner's Office

Telephone: 0303 123 1113
Email: wales@ico.org.uk

Sharing and Disclosing Your Personal Information

We may share your personal information where necessary to provide our services, meet legal and regulatory obligations, or support the operation of our business. Recipients of personal information may include:

Recipient Category	Purpose
Product providers and pension providers	To arrange, administer and manage financial products and services
Investment and platform providers	To support the provision of financial planning and investment services
Professional advisers	Including accountants, solicitors and other professional advisers where authorised or required
Identity verification and anti-money laundering providers	To meet legal and regulatory obligations
Technology and business service providers	To support our systems, business operations and record management
Regulators, law enforcement agencies and government bodies	Where disclosure is required by law or regulation

We only share personal information that is necessary for the relevant purpose and take reasonable steps to ensure that any third parties handling personal information on our behalf apply appropriate security and confidentiality measures.

Details of the third-party organisations that process personal information on our behalf are maintained separately and are available upon request. This information is reviewed periodically to ensure it remains accurate and up to date.

We do not sell your personal information to third parties.

Safeguarding Measures

We take the security of your personal information seriously and have implemented appropriate technical and organisational measures designed to protect it from unauthorised access, loss, misuse, alteration or disclosure.

These measures include physical, electronic and procedural safeguards, together with policies and controls designed to protect the confidentiality, integrity and availability of personal information.
Access to personal information is restricted to those employees, advisers and service providers who require it for legitimate business, legal or regulatory purposes.

We regularly review our security arrangements to help ensure that personal information remains protected and that our practices continue to meet legal, regulatory and business requirements.

Although we take appropriate steps to protect personal information, no method of transmission or storage can be guaranteed to be completely secure.

Consequences of Not Providing Your Data

In order to provide financial planning, wealth management and related services, we require certain personal information from you.

Where personal information is required to enter into or perform a contract, or to meet legal and regulatory obligations, failure to provide that information may prevent us from:

- Providing financial advice or related services;
- Assessing the suitability of our recommendations;
- Verifying your identity;
- Complying with anti-money laundering requirements; or
- Meeting our legal and regulatory obligations.

In such circumstances, we may be unable to establish or continue a client relationship, provide advice, or arrange financial products and services on your behalf.

How Long We Keep Your Data

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, including satisfying legal, regulatory, accounting and business requirements.

As a Financial Conduct Authority (FCA) regulated firm, we are required to retain certain records for specified periods in accordance with regulatory requirements. The length of time that personal information is retained will depend on the nature of the information, the services provided, and the applicable legal or regulatory obligations.

When personal information is no longer required, it will be securely deleted, destroyed or anonymised in accordance with our records retention and disposal procedures.

Further information regarding our retention periods is available upon request.