



## Privacy Notice

### Who We Are

**Burley Fox Limited** ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and law. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

**Burley Fox Limited**'s registered office is at **20 Cathedral Road, Cardiff, CF11 9LJ** and we are a company registered in England and Wales under company number **08644340**. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number **ZA026984**, and act as the data controller/data processor.

Our designated Data Protection Officer for the organisation is Paul Fox, and we can be contacted at:

**Burley Fox Limited**  
20 Cathedral Road  
Cardiff  
CF11 9LJ

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

### Information That We Collect

**Burley Fox Limited** processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

**This is not an exhaustive list but examples of the personal data that we collect are: -**

- Name
- Date of Birth
- Home Address
- Personal Email / Business Email
- Family / Dependents' details
- Home Telephone Number / Work Telephone Number / Mobile Telephone Number
- National Insurance Number
- Birth / Marriage / Death certificates
- Passport Number
- Driver's License Number
- Special Category Data (*i.e. health/medical information/ gender etc.*)
- Financial Information (*i.e. Income, assets & Liabilities, Savings, Investments, Pensions, etc.*)
- Attitude to risk & Capacity for Loss

### **Examples of the ways in which we collect information is as follows: -**

- 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
- Electronic downloads from providers where we are your already your adviser
- Online/Website Forms
- Employment CV's

### **How We Use Your Personal Data**

**Burley Fox Limited** takes your privacy very seriously and will never disclosure, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw consent at any time.

### ***Examples of the purposes and reasons for processing your personal data are detailed below: -***

- We collect your personal data in the performance of a contract or to provide a service and to ensure that correspondence/documents can be sent out to your preferred address/contact
- We collect and store your personal data as part of our legal obligation for business as we are regulated by the Financial Conduct Authority and we have obligations in respect of the maintenance of client records
- We have a legal obligation to share your personal data in order to comply with our legal duty to confirm your identity and address in respect of the Anti-Money Laundering Regulations
- We have a legal obligation to share your personal data with a credit reference agency and provide us with financial background checks prior to you commencing employment with us

### **Your Rights**

You have the right to access any personal information that **Burley Fox Limited** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

## Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Burley Fox Limited** uses third-parties to provide the below services and business functions, however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

**BPU Chartered Accountants:** *Radnor House, Greenwood Close, Cardiff Gate Business Park, CF23 8AA.* BPU stores and processes staff personal data and office financial data for payroll, bookkeeping and tax return purposes. The information provided to them, is not in excess of what they legally require to action the service we employ them for.

Link to Privacy Statement - <https://www.bpuaccountants.co.uk/disclaimer>

**Intelligent Office:** *Intelliflo Limited, 3rd Floor, Drapers Court, Kingston Hall Road, Kingston-upon-Thames, Surrey, KT1 2BQ.* Intelligent Office stores our client personal and special category data as it is our database / back office system. The information we input to this system, is not in excess of what we legally require to offer the services to our paying clients.

Link to Privacy Statement – <https://www.intelligentoffice.com/company/privacy/>

**Amazon S3 Web Services:** *Intelliflo Limited, 3rd Floor, Drapers Court, Kingston Hall Road, Kingston-upon-Thames, Surrey, KT1 2BQ.* Intelligent Office stores our client personal and special category data as it is our database / back office system. All of our documents relating to clients is stored with Amazon through an integration with Intelligent Office. The documents stored are all pertinent to record relating to our client's and the work we do for them.

Link to Privacy Statement – <https://aws.amazon.com/privacy/>

**Hosted Desktop UK:** *Hosted Desktop UK Limited, Unit 24 Basepoint Business Centre, Yeoford Way, Marsh Barton Trading Estate, Exeter, EX2 8LB.* Hosted Desktop is our cloud based system provider, and stores all of our staff and client personal and special category data in an electronic format in an off site server. All data stored on the Hosted Desktop Server relates to client records, business operation and staff records required for payroll and continuing personal development, to meet business and legal requirements.

Link to Privacy Statement - <https://www.hosteddesktopuk.co.uk/privacy/>

**FE Analytics:** *3rd Floor, Hollywood House, Church Street East, Woking GU21 6HJ.* FE Analytics is our Fund based analysis tool provider, and stores only Names, policy numbers and portfolio of funds for clients. This information is required to provide the services to our paying clients.

Link to Privacy Statement – [Please contact us if you'd like a copy of this, as is only available to system users through the log in.](#)

**O&M Systems Profiler:** *2 Charter Court, Severalls Business Park, Colchester, Essex, CO4 9YA.*  
O&M Profiler is our pension switch analysis provider for ordinary pension switches. All data stored on the O&M Profiler system relates to clients requiring advice on ordinary pension transfers, which are to meet business and legal requirements.

Link to Privacy Statement - <https://www.omsystems.co.uk/legal.html>

**O&M Pensions:** *3 The Courtyards, Phoenix Square, Wyncolls Road, Colchester, Essex, CO4 9PE.*  
O&M Pensions are our Transfer Analysis Report provider for Defined Benefit pension transfers. All data stored on the O&M Pensions system relates to clients requiring a Transfer Analysis report for Defined Benefit pension transfers, which are to meet business and legal requirements.

Link to Privacy Statement - <https://www.ompensions.co.uk/legal-notices/privacy-policy.aspx>

## Safeguarding Measures

**Burley Fox Limited** takes your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

**SSL, encryptions, security practices, restriction, IT, authentication, etc.**

## Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **Burley Fox Limited**, however, as this information is required for us to provide you with our regulated advisory services, we will not be able to offer any of our products or services without it.

## How Long We Keep Your Data

**Burley Fox Limited** only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

For example, we are required under UK tax law to keep PAYE basic personal data for a minimum of 3 years after the end of the tax year in which an employee left service.

We are also regulated by the Financial Conduct Authority who have their own requirements which we must comply with. As an example, (FCA COBS 9.5.2), we must retain records relating to suitability for a minimum of the following periods:

- If relating to a pension transfer, pension conversion, pension opt-out or FSAVC, indefinitely;
- If relating to a life policy, personal pension scheme or stakeholder pension scheme, five years;
- In any other case, three years.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## Lodging a Complaint

**Burley Fox Limited** only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

**Paul Fox**  
**Burley Fox Limited**  
**20 Cathedral Road**  
**Cardiff**  
**CF11 9LJ**

**Telephone:** 029 2167 9770  
**E-mail:** [paul.fox@burleyfox.com](mailto:paul.fox@burleyfox.com)

**Information Commissioner's Office**  
**2nd floor**  
**Churchill House**  
**Churchill way**  
**Cardiff**  
**CF10 2HH**

**Tel:** 029 2067 8400

**Fax:** 0292 067 8399

**Email:** [wales@ico.org.uk](mailto:wales@ico.org.uk)