



44 BENEFIT SOLUTIONS

## PRIVACY POLICY

APRIL 2018



## **PRIVACY NOTICE**

We hold personal data of individuals with whom we have contact in the course of our activities. This policy sets out how we seek to protect such personal data. 44 may already be in contact with you and your company or may do so in the future. We'd like you to be confident in the manner that we conduct our business and handle any personal data in the conduct of our business.

44 includes 44 Benefit Solutions Ltd as an appointed representative of 44 Financial Ltd, authorised and regulated by the Financial Conduct Authority. Registered Office: 9 Woodbrook Crescent, Billericay, Essex CM12 0EQ T: 01277 523 144. Registered in England & Wales number 08272027

### **What personal information do we hold?**

The personal information we collect about you is made up from the information you and others give us during your use of our website, our services and during our communications with you.

### **How your personal information is used.**

We may contact you with information of our own products and services, if we believe there may be a genuine interest in our specialist products and services. We send most of our publications, event information and marketing communication via email but we may from time to time use other permitted means such as post or telephone. We will use our discretion as to which channels we will employ, however we will never over-burden you with excessive contact and will respect your wishes in terms of your rights. If you prefer to opt out of receiving our publications the easiest way to do this is via email through our website, see below. 44 will only use this information held for legitimate purposes of 44. The legal basis for holding personal data is the individual's consent.

If you are a current or lapsed client, we process your personal information for the purpose of contractual business interests. This allows us to manage your account and keep your personal information for financial/auditing/compliance purposes.

### **How long will we keep your information for?**

If you do not respond to our communications after 2 years, we will re-engage with you and, if you wish to, we will delete your personal information.

However, if we are in discussion with you about our services, we will hold your personal information for 7 years. We will ensure that your personal information is kept up-to-date and verified on an annual basis. You have the right to find out what personal information we hold about you. If any of your details are incorrect, inaccurate or incomplete you can ask us to correct them or to add information. You can ask us to delete your personal information if we do not need to keep your information for legal or regulatory reasons.

If you are an existing or lapsed customer, we will keep your personal data for the duration of our business relationship with you and for as long as it's considered necessary, for the purpose for which it was collected, and to comply with our legal and regulatory requirements. This will involve keeping your information for a reasonable period of time after your relationship with us has ended.

In the absence of specific legal, regulatory or contractual requirements, any other personal information is kept for our baseline retention period - this is seven years after ceasing our services. You have the right to find out what personal information we hold. If any details are incorrect, inaccurate or incomplete you can ask us to correct them or to add information. You can ask us to delete personal information if we do not need to keep the information for legal or regulatory reasons.

### **How do we keep your personal information safe and secure?**

We take technical and organisational measures to ensure the security of your data.

- Your data will only be used for the intended purpose by 44
- Your data will never be shared with any other company
- Your data will never be sold to any third parties
- Your data will be processed securely in the UK and will not be transferred outside the European Economic Area.
- No more data is held than is necessary
- 44 will take reasonable steps to ensure data is kept accurate

### **What rights do I have?**

You have the right to:

- Obtain a copy of the personal data held about you
- Have the data rectified, if it is inaccurate
- Have the data erased if it is no longer necessary us to hold them
- Withdraw any consents you have given to us in respect of your personal data, where we have asked for and are relying on your consent
- Complain to the Information Commissioners Office if you believe your data is being processed unlawfully using the following details:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113 or 01625 545 745  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

More information with regard to your rights can be found on [the Information Commissioner's Office's website](#).

### **Contact**

If you have any questions please contact Laura Hatcher – Manager Client Service on 02177 523 144 or email [admin@44benefits.co.uk](mailto:admin@44benefits.co.uk) or visit [www.44benefits.co.uk](http://www.44benefits.co.uk)