

## 2plan Data Privacy & Cookies Policy

Data protection is taken seriously at 2plan and safeguarding the privacy of our website visitors and clients information in general is very important to us. Our Data Privacy & Cookies Policy provides details on which any personal information we may collect from you, or you provide to us, will be processed and used by us.

### Our website

By using our website or by registering for any of the products and services we offer through it, you are confirming to us that you understand and accept that your personal information may be used by us in the manner described below. We may keep details of your visits to our website including, but not limited to, traffic data, location data, weblogs.

2plan are not responsible for any information provided by any other source once you leave the 2plan site. Any links from our website to other websites are provided merely for your convenience and do not imply our endorsement of the content or the provider. If you follow a link to any of these websites, you do so at your own risk and we do not accept any responsibility or liability for the content of such websites. **You need to be satisfied that these links are safe.**

### Cookie Types and Details

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. Some of the cookies we use are essential for the site to operate. The cookies we use are:

*Session cookies* - Session cookies only retain information about your activities during your visit to the site. Once you close the browser, the session cookies are lost and the site will not recognize you the next time you return to the site. Session cookies help websites to recognize you and remember the information provided by you as you move from one page to another within the same website. If you have to login to a website every time you open your browser and visit it - then it is using a session cookie to store your login credentials. Many websites use session cookies for essential site functions, and to make sure pages are sent to the browser as quickly and efficiently as possible.

*Persistent cookies* - Persistent cookies enable websites to remember your preferences and settings (i.e. login information, language selection, font size preference, etc.) so that they can offer you a more personalized and convenient access the next time you visit. For security purposes, your login information is generally encrypted by the web server before it gets stored in a cookie. Persistent cookies can exist for an extended period of time until expired or until they are deleted. They enable the site to recognize you on a continuous basis. This is done by the web server planting a small text file with a unique ID tag on your computer, while keeping a matching file on the server. On subsequent visits to the site, your browser delivers this cookie over to the site, allowing the site to retrieve the matching file. If you login into a website, then shut down your computer, start it up again, and go back to the website to find you are still logged in - then it is using a persistent cookie to remember you.

### Information we may collect from you

2plan are both Data Controllers and Data Processors of information you provide to us.

We ask for your permissions and consent to use your personal information to enable 2plan and /or one of its network of Independent Financial Advisers to provide you with detailed advice or proposals on the financial products and services you have asked about.

Any of the consented personal information you have provided will only be specifically used for these purposes.

We may collect and process the following data about you:

- information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our products and services, posting material or requesting further products and services. We may also ask you for information when you report a problem.
- Personal details that you provide by completing in-depth information gathering either remotely or face to face with one of our network of 2plan registered and approved advisers in relation to offering you advice on financial products and services you have asked us about.
- if you contact us, we may keep a record of that correspondence (including email and phone conversations) including your name, address, telephone numbers, email address and other information which you supply to us
- we may also ask you to complete surveys or questionnaires that we use for research and regulation purposes, which you have agreed to. Where we also asked if you would like to receive our Newsletter, you can opt out from receiving future editions.
- Processing of information will only take place under contract in the UK.

## Uses made of your information

We may use information held about you in the following ways:

- to ensure that content from our website is presented in the most effective manner for you and for your computer
- to provide you with information, products or services that you request from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes
- to carry out our obligations arising from any contract entered into between you and us and that may involve providing some of your information to a third party to carry out necessary background checks (including but not limited to Identity Verification / Anti Money Laundering / Residency Confirmation)
- provide some or all of your personal information (as required) to one or more financial products providers in order to fulfil a detailed proposal for the services you have asked 2plan about
- for training purposes, quality assurance or to record details about the products and services you order from us
- to satisfy and meet our legal and regulatory requirements with the FCA and ICO, or as requested by UK security services
- to notify you about changes to our products and services
- as the financial service market is continually changing, 2plan will endeavour to provide best industry advice in relation to your specific need by analysing and monitoring the markets and your portfolio. This may involve a form of profiling of your details against most suitable products and services. These analyses are constantly evolving and 2plan reserve the right to use these to ensure you receive continued best advice.

Unless prescribed by law, we will retain your details for no longer than is necessary for the purposes for which the personal information was collected or for which it is to be further processed by us.

## Disclosure of your information

We may disclose your personal information to any member of the 2plan group of companies.

We may disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal or regulatory obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of our customers, or others.

## Your rights and how to contact us

### Your rights

You have a right of access to personal information which we may hold about you. You have a right to have inaccurate information about you corrected or to request we stop using your personal information for marketing and other purposes. You have a right to have your personal details removed from any further processing. This may mean they are deleted or, where regulations demand, removed from our systems and held securely in the event they require auditing. If the latter is the case, no further access will be made without your knowledge. Subject Access Requests should be put in writing and addressed to:

The Data Protection Officer, 2plan wealth management ltd, 3<sup>rd</sup> floor Bridgewater Place, Water Lane, Leeds, LS11 5BZ

### Contact information

We regularly review our policies and any changes will be posted on our website.  
This Data Privacy & Cookies Policy was last reviewed March 2018.

If you have comments or any questions about our Data Privacy & Cookies Policy please contact: [data.protection@2plan.com](mailto:data.protection@2plan.com)

2plan wealth management - **Company registration number – 05998270, Data Protection registration number - Z9770624 ,**

**FCA registration number – 461598, VAT registration number - 894679251**

### For your information -

**Financial Conduct Authority** - Head Office: 25 The North Colonnade, London E14 5HS - (0)20 7066 1000

**Information Commissioners Office** - Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF - 0303 123 1113