

## **Privacy Policy**

This privacy notice tells you what to expect when Origen Financial Services collects personal information. If you have any questions about this notice or data protection, please contact our Data Protection Officer.

Post: Data Protection Officer, Origen, Infor House, 1 Lakeside Road, Farnborough, Hampshire, GU14 6XP  
Email: [compliance@origenfs.co.uk](mailto:compliance@origenfs.co.uk)

### **Your information**

When you visit our website, the web server does not record any information about you. However, we do use cookies which track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. Please refer to our Cookie policy for more information.

On completion of the Get In Touch and Media Library page, the information provided is received in email format by Origen.

We keep any personal information supplied on our computer systems and in manual records. It could include information not only about you but also about others, for example your partner, dependants or beneficiaries. We understand that we need to do all we can to protect your privacy, while upholding the law and administering your products and services efficiently. So we have proper practices in place for obtaining, holding, processing and sharing your information, and always aim to be clear about what those practices are.

We don't sell personal information or use your personal data for any purposes other than those outlined, unless you authorise it.

We have policies in place, which mean that we hold all personal data securely and limit access to those who need to see it.

We will regularly review our retention obligations to ensure we don't keep personal information longer than we're legally obliged to. This ensures we comply with our retention obligations, as set out by the Financial Conduct Authority (FCA) and other regulatory and legislative requirements.

### **How we use your personal information**

Origen will use your information in the following ways:

- to assess financial requirements and suitability of products;
- for administration when the plan or policy has been set up;
- to provide services to any arrangement, trust or scheme that your plan or policy is part of;
- for statistical or research purposes. We keep a record of the policies you hold, and may use your information to let you know about other products and services that might be of interest to you from Origen Financial Services Limited. If you don't want to receive this kind of information, you can let us know at any time by writing to Client Liaison, Origen, Infor House, 1 Lakeside Road, Farnborough, Hampshire GU14 6XP, by emailing [clientliaison@origenfs.co.uk](mailto:clientliaison@origenfs.co.uk) or by calling 0344 209 3925 (all calls are

- charged at your phone company's basic rate. All calls are recorded for business purposes.); or
- for testing our systems.

### **Sharing your personal information**

It's sometimes necessary to disclose your personal information or to collect it from other sources. These other sources may include past and present employers, providers, the trustees or administrators of a scheme, or person officially acting on your behalf, as well as those described below. This information-sharing may be by electronic means, in which case we take every care possible to make sure access to systems is restricted and the systems themselves are as secure as possible.

If we request medical information, from you or from medical practitioners who have cared for you or from other insurers, this information counts as a 'special category' under Data Protection legislation and is treated particularly strictly. We will request your consent to hold any sensitive data and it will only be available to those who need to see it.

By law, we also need to share information about customers and the products and services they have with us with other legal bodies. These include, among others, HM Revenue & Customs and the Financial Conduct Authority. With your specific consent, we would also share your information with the Financial Ombudsman if the need arises. We may disclose information to comply with money laundering laws and for other purposes, for example, detecting crime.

We may also disclose your information to third party organisations who process data on our behalf. This could include processing information outside the European Economic Area (EEA). However, where such processing takes place, appropriate controls are in place to ensure the protection of your information to the same standard as if it were in the UK.

### **How we will keep in touch if you are not an Origen client**

If you are not a client of Origen Financial Services, we will only contact you with information about the services we offer if you have provided specific consent for us to do so.

This consent will be valid for 2 years, after which we will remove your details, unless you provide additional consent to continue to hold your data for a further 2 years.

Within every communication you receive from us, you will be provided with the option to unsubscribe from these communications. You can do this at any time by writing to Origen Financial Services, 1st Floor, Infor House, 1 Lakeside Road, Farnborough, Hampshire, GU14 6XP, emailing us at [clientliaison@origenfs.co.uk](mailto:clientliaison@origenfs.co.uk) or calling us on 0344 209 3925. Calls are charged at your phone company's basic rate. All calls are recorded for business purposes.

### **How we will keep in touch if you are an Origen client**

Once you become a client and have received a service from Origen Financial Services, the information held about you may be used to contact you from time

to time by post, e-mail, text messaging (SMS) or telephone in order to inform you of other relevant services which we offer.

The lawful basis under Data Protection legislation used to process this information is called legitimate interest. This means that Origen will not be collecting your consent to stay in touch with other relevant services we may offer. Instead Origen will conduct balance tests to ensure your rights as an individual under GDPR are respected.

Within every communication you receive from Origen, you will be provided the option to unsubscribe from these communications. You can do this at any time by writing to Origen Financial Services, 1st Floor, Infor House, 1 Lakeside Road, Farnborough, Hampshire, GU14 6XP, emailing us at [clientliaison@origenfs.co.uk](mailto:clientliaison@origenfs.co.uk) or calling us on 0344 209 3925. Calls are charged at your phone company's basic rate. All calls are recorded for business purposes.

### **Our Data Protection Controls**

By using appropriate and consistent management and controls, we'll:

- meet our legal obligations to specify what we're using the personal information for, which you can find on the Information Commissioner's website at <http://www.ico.org.uk>
- only collect and process information to the extent that we need it to operate or to comply with a legal requirement
- make sure the information is accurate and of high quality
- apply checks to determine how long the information is held for
- make sure that the people we hold information on can fully exercise their rights under data protection legislation
- safeguard personal information by taking appropriate technical and organisational security measures
- make sure that personal data isn't transferred outside the EEA without suitable safeguards
- fully support and follow the rights of Data Protection, as set out in the Data Protection legislation. We make sure that our staff – and those acting on our behalf – obtain, use and disclose personal data lawfully and correctly.

### **Your individual rights**

You have a number of rights under Data Protection legislation, including:

- the right to request a copy of the personal information we hold on you. When you request this information, this is known as making a Subject Access Request (SAR). In most cases, this will be free of charge, however in some limited circumstances, for example, repeated requests for further copies, we may apply an administration fee. If you would like a copy of your personal data, please write to our Data Protection Officer (contact details are at the start of this notice) enclosing your details, a description of the information you want.
- the right to have any inaccurate personal information corrected.
- the right to have any out of date personal information deleted once there's no business need or legal requirement for us to hold it.
- the right to object or restrict some processing, in limited circumstances and only when we don't have legitimate grounds for processing your personal information.

- the right to object to your personal information being used to send you marketing material. You can stop receiving these at any time by writing to Client Liaison, Origen, Infor House, 1 Lakeside Road, Farnborough, Hampshire GU14 6XP, by emailing [clientliaison@origenfs.co.uk](mailto:clientliaison@origenfs.co.uk) or by calling 0344 209 3925 (all calls are charged at your phone company's basic rate. All calls are recorded for business purposes.)

To exercise any of these rights, please contact our Data Protection Officer.

### **Making a complaint**

If you believe we haven't processed your personal information in accordance with our Data Protection obligations, and that you've been affected by our non-compliance, you can make a complaint to us by contacting our Data Protection Officer.

If you're not satisfied with our response, you can raise a complaint with the Information Commissioner's Office, the UK's independent authority set up to enforce the Data Protection Regulations.

### **Security**

We're committed to ensuring your information is protected and held securely. However, the internet is not a secure medium and we can't accept responsibility for the security of an email during transmission or for non-delivery of that email. We've put security policies, rules and technical measures in place to protect the personal data that we have under our control from:

- unauthorised access
- improper use or disclosure
- unauthorised modification
- unlawful destruction or accidental loss

All our employees and data processors who have access to, and are associated with, handling our visitors' personal data are obliged to respect its confidentiality.

### **Links**

This website may contain links to other websites. If you use the links to leave this website and visit a website operated by a third party, we then have no control over that website. We cannot be held responsible for the protection and privacy of any information that you provide while visiting such websites.

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 25<sup>th</sup> July 2018.

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Origen Financial Services is a trading name used by Origen Financial Services Limited which is authorised and regulated by the Financial Conduct Authority. Our FCA registration number is 192666. Our Registered Office is: Infor House, 1 Lakeside Road, Farnborough, Hampshire, GU14 6XP and registered number 03926629.

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