

## Data and How We Use It

---

In the information age, it is only proper that you have concerns regarding personal data and how it is used.

When you provide information about your clients to us, you remain the data controller and we are the data processor. We only use this information to carry out our obligations arising from the contracts entered into between you and us.

We recognise and respect the rights of individuals to data protection, in addition to the commercial sensitivity of this data to you.

The purpose of this document is to clarify how we keep data private and use it only for the benefit of you and your clients.

### **Secure technology:**

- All Full Moon Analysis computer hardware is covered by firewall and virus protection
- The Full Moon Analysis website is hosted on secure servers
- Only the introducing adviser and the Full Moon Team have access to client data online utilising secure, encrypted login
- All sensitive information is encrypted to industry standard between browser and server

### **Limit the use of data to what is necessary to get the job done:**

- We will share data with third parties, but only in the interest of completing work
- Third parties include relevant life offices, pension comparison and investment tools (please ask for more specific information), who each must adopt strict privacy rules
- We will store your clients' data on our server so you can access their reports at any time
- We may also use this data for your benefit, for example to remind you of a review

### **The Full Moon Team:**

- May approach third parties acting as your paraplanner – usually the providers of existing policies
- Fully embrace the principles and spirit of the UK's Data Protection Act 2018 and the EU's GDPR

### **We will never:**

- Share data with third parties for the purposes of commercial gain or marketing
- Act where there may be a conflict of interest between advisers

We take data protection very seriously and, of course, we are registered with the Information Commissioner's Office. Our registration number is Z1874952 and our Data Controller is David Hewitt.