

Arlo Group UK Ltd Privacy Notice

Arlo Group UK Ltd takes the privacy of personal data seriously - we therefore ask you to please read the following important information which explains how we collect, store and use your personal data.

Arlo Group UK Ltd is registered as a Data Controller with the Information Commissioner's Office (ICO) under the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulations (UK GDPR).

1. Who are we?

Arlo Group UK Ltd is registered in England under company number 4199059 and office address: Suite 6 Penistone 1, Regent Court, St Mary's Street, Penistone S36 6DT. Arlo Group UK Ltd is authorised and regulated by the Financial Conduct Authority for the provision of financial advice.

2. What do we mean by Personal Data?

By personal data (or personal information), we mean information that relates to you and is used to identify you, either directly or in conjunction with other material we hold.

Your Personal Data may identify you directly, for example your name, address, date of birth, national insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of Arlo Group UK Ltd providing you with advice and guidance in relation to your requirements your Personal Data may include:

- Name, Date of Birth, Gender, Nationality, Civil/Marital Status, Contact Details, Addresses and any documents that are necessary to verify your identity
- Employment and remuneration information
- Bank account details, tax information, commitments for liabilities such as loans and credit cards, personal credit history, sources of income and expenditure
- Health status and history (this is referred to as Special Category Data)
- Existing Plan information
- If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Category Data.

3. Why do we collect information from you?

We use your personal information for the following:

1. Provision of services and advice or to provide you with the information, products and services you have requested from us.
2. To comply with regulation and legislation in relation to anti-money laundering regulation and the Financial Services & Markets Act.

In order to undertake our services for you, we have the right to use your Personal Data provided it is in our legitimate business interest. We may be required to share this data with providers in

The Arlo Group UK Limited

Head and Registered office: Suite 6, Penistone 1, Regent Court, St. Mary's Street, Penistone, S36 6DT. Tel: 01226 970444

Torquay office: 4th Floor, Harbour Point, Victoria Parade, Torquay, Devon, TQ1 2BD

London office: 4-12 Regent St, 4th Floor Rex House, London SW1Y 4PE

email: enquiries@arlo-group.co.uk ~ website: www.arlo-group.co.uk

Registered in England No: 4199059 Authorised and Regulated by the Financial Conduct Authority No: 208467

relation to obtaining illustrations to make a recommendation to you, with our Compliance Service Provider in relation to any advice provided to you or make contact with you in relation to the service you have received.

4. How do we collect information?

Most information we obtain will be directly from you during our meetings and discussions or this may be in writing, including via email.

We may also need to obtain information from third parties in relation to verifying your identity if this is done electronically. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

5. What do we mean by Special Category Data?

Where you ask us to advise or guide you on certain elements such as insurance, ethical investments or retirement income, we will ask you information about your ethnic origin, your health and medical history (Your Special Category Data). We will record and use your Special Category Data in order to make enquiries to find suitable products that may meet your aims and objectives and to provide you with advice or guidance regarding the suitability of any product that may be available to you.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This relates to insurance related activities such as underwriting, claims and fraud management. We will use Special Category Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice. In order to process your Special Category Data however, we do require explicit consent.

6. How do we protect your personal information?

We have strict safeguarding processes to ensure that we meet our obligations under the Data Protection Regulations 2018. Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We will:

- Record and store your Personal Data in our paper files and electronic files on our computer systems, which can only be accessed by Arlo Group UK Ltd staff when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit your Personal Data to providers both electronically or via paper-based forms to allow us to advise you or process your application for a product, or to obtain information as required as part of our services
- Use your Personal Data to respond to any queries you have on your policies under our Agency

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us.

The Arlo Group UK Limited

Head and Registered office: Suite 6, Penistone 1, Regent Court, St. Mary's Street, Penistone, S36 6DT. Tel: 01226 970444
 Torquay office: 4th Floor, Harbour Point, Victoria Parade, Torquay, Devon, TQ1 2BD
 London office: 4-12 Regent St, 4th Floor Rex House, London SW1Y 4PE
 email: enquiries@arlo-group.co.uk ~ website: www.arlo-group.co.uk

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

7. What are your rights surrounding your personal information?

Your enhanced rights under the GDPR include:

- The right of access – we will provide a copy of your personal data within 30 days of requests. Requests can be made in writing, by phone or by email. We will not charge a fee for this unless we think your request is unfounded, excessive or repetitive; in which case we will inform you before proceeding with your request.
- The right to rectification – you may ask us to rectify any of your personal data which you believe is inaccurate or incomplete. We will respond within one month (this can be extended by two months where the request for rectification is complex). Requests can be made in writing, by phone or by email.
- The right to erasure – you have the right to request ‘to be forgotten’, i.e. for us to delete all records of your personal data. We will comply with your request, unless we have a legal obligation to continue to hold your personal data (in which case we will inform you of the reason why we cannot delete the data).

8. Who do we share your personal information with?

We will only share your personal data with third parties when it is necessary for the service you have asked us to provide, and we will have contracts/safeguards in place to ensure that they comply with the GDPR and treat the privacy of your personal data with the same importance as we do.

9. Who to contact at Arlo Group UK Ltd in relation to your Personal Data

If you have any questions or comments about this document, or wish to contact Arlo Group UK Ltd in order to exercise any of your rights set out within it please contact:

Data Officer by email on david.evans@arlo-group.co.uk , by telephone on 01226 970444 or by writing to: Suite 6 Penistone 1, Regent Court, St Mary’s Street, Penistone S36 6DT

If we feel we have a legal right not to deal with your request, or to action it in different way to how you have requested, we will inform you of this at the time.

You should make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of your Personal Data, so that we may investigate and fulfil our own regulatory obligations. If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK’s data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

The Arlo Group UK Limited

Head and Registered office: Suite 6, Penistone 1, Regent Court, St. Mary’s Street, Penistone, S36 6DT. Tel: 01226 970444
Torquay office: 4th Floor, Harbour Point, Victoria Parade, Torquay, Devon, TQ1 2BD
London office: 4-12 Regent St, 4th Floor Rex House, London SW1Y 4PE
email: enquiries@arlo-group.co.uk ~ website: www.arlo-group.co.uk