



DATA RETENTION POLICY

In order to receive certain information and to use our services, you will be asked to provide personal information about yourself such as your name, address and email address. When you provide this information to us, you consent to our use of that information in accordance with the terms of this Privacy Policy. This information will be used to provide you with the services that you have requested. We may use your personal information together with other information for providing legal services, credit checks, money laundering, administration and training and we may disclose information to our service providers and agents for these purposes. it.

Information about you that we collect and use includes:

- Information about who you are - eg your name, date of birth and contact details
- Information connected to your product or services with us - eg your bank account details
- Information about your contact with us -eg meetings, phone calls, emails/letters
- Information that is automatically collected - eg via cookies when you visit one of our websites
- Information if you visit one of our offices - eg visual images collected via closed circuit televisions (CCTV)
- Information classified as 'sensitive' personal information - eg relating to your health, marital or civil partnership status. This information will only be collected and used where it's needed to provide the product or services you have requested or to comply with our legal obligations
- Information you may provide us about other people - eg joint applicants or proprietors or beneficiaries for products you have with us
- Information on children - eg where a child is named as a beneficiary in a Will or on the policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender)

We are committed to processing your data in a lawful, fair and transparent manner.

Where we collect your information

We may collect your personal information directly from you, from a variety of sources, including:

- an application form for a product or service
- phone conversation with us
- emails or letters you send to us
- meetings with one of our solicitors, or other member of staff

- participating in research surveys to help us understand you better and improve our products and services
- our online services such as websites, social media and mobile device application ('Apps')

If you have a financial adviser and/or are a member of your employer's pension scheme, the information we collect and use will most likely have been provided by them on your behalf.

We may also collect personal information on you from places such as business directories and other commercially or publicly available sources - eg to check or improve the information we hold (like your address) or to give better contact information if we are unable to contact you directly.

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- you have given us your permission [consent] to send you information about products and services offered by us and/or selected third parties we have chosen to work with which we believe may be of interest and benefit to you
- it's necessary to provide the product or service you have requested - eg if you wish to market your property through us we will require some personal information including your name, address, date of birth, bank account details
- it's necessary for us to meet our legal or regulatory obligations - eg to send you Annual Statements, tell you about changes to Terms and Conditions or for the detection and prevention of fraud and anti-money laundering
- it's in our legitimate interests - eg to deliver appropriate information and guidance so you are aware of the options that will help you get the best outcome from services; where we need to process your information to better understand you and your needs so we can send you more relevant communications about the business and products you have with us and to develop new products and services; where we use artificial intelligence or computer algorithms to improve the products and services offered to you
- it's in the legitimate interests of a third party
- If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products and services.
- We also use technologies, such as the Facebook Pixel, to customise content and advertising, to provide social media features and to analyse traffic to the site. We also share information about your use of our site with our trusted social media, advertising and analytics partners.

Who we may share your information with

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for'

These third parties include:

- your adviser or employer
- our regulators and any Supervisory Authority - e.g. the Law Society of Scotland, the Information Commissioner's Office for the UK (the ICO)
- law enforcement, credit and identity check agencies for the prevention and detection of crime. More information about TransUnion's activities are available at <https://www.transunion.co.uk/legal-information/bureau-privacy-notice>

- HM Revenue & Customs (HMRC) or the National Crime Agency (NCA) - eg for the prevention of tax avoidance
- We will never sell your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Where information is processed

The majority of your information is processed in the UK and European Economic Area (EEA)

How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

How long we keep your information

We will keep your personal information only where it is necessary to provide you with our products or services while you are a client.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how AC uses your information. They are:

Right to be informed

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with - we do this in this Privacy Policy and any privacy notices.

Right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a Data Subject Access Request (DSAR).

Right to request that your personal information be rectified

If your personal information is inaccurate or incomplete, you can request that it is corrected.

Right to erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for us to continue to have it.

Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information - but only to ensure we don't use it in the future for those reasons you have restricted.

Right to data portability

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example if you were transferring your business to another Firm or if you were moving your pension to another pension provider.

Right to object

You can object to us processing your personal information where it's based on our legitimate interests.

Rights related to automatic decision making including profiling

You have the right to ask us to:

- give you information about our processing of your personal information
- request human intervention or challenge a decision where processing is done solely by automated processes
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please raise your concerns in writing with our Client Relations Partner, Jonathan Tait, 9 Crown Street, Aberdeen AB11 6HA

Your complaint will be acknowledged within five working days and normally, after a full investigation, you will receive a detailed response within a further ten working days.