

## PRIVACY POLICY

### 1. Privacy Statement of Bradshaw Dixon & Moore Limited

- 1.1 In this Privacy Policy, a "Practitioner" is a practitioner who uses the Site in relation to one or more modules of the automated, online services of Bradshaw Dixon & Moore Limited ("BDM") which services are designed to assist a Practitioner and their client ("Practitioner's Client") in the area of pensions within the ancillary relief process (any or all of which modules or services can be referred to as "Pension Relief Service") and the masculine shall include the feminine and the neuter and the single shall include the plural and *vice versa*.
- 1.2 Under the Data Protection legislation, BDM must comply with certain regulations designed to ensure that any data provided is processed with proper care and attention, but in any event BDM is committed to safeguarding the privacy of Practitioners and Practitioner's Clients where the Practitioners use BDM's site ("Site") and the following explains the information-gathering and dissemination practices of BDM relating to the Site.
- 1.3 Except as permitted by this Privacy Policy, BDM will not share information pertaining to a Practitioner's Client with parties other than the Practitioner without the prior, written consent of the Practitioner's Client.
- 1.4 Where the Site contains links to third party sites, this Privacy Policy does not apply to such sites.

### 2. Data collected by BDM

- 2.1 For the purpose of the Pension Relief Service, personal and financial data is collected by BDM, which information may include (but may not necessarily be limited to) in relation to the Practitioner's Client his name and address, marital and other details and / or the name and address, marital and other details of any other parties involved in the Pension Relief Service.
- 2.2 Supplementary information relevant to the Pension Relief Service may be collected by BDM and (by way of example, but not necessarily exclusively) may include the medical, marital or other information relating to the Practitioner's Client or to other parties.
- 2.3 In addition, information may be collected by BDM automatically (which information could include demographic data, geographic trends and browsing patterns) in order to assist strategic development, to audit usage of the Site and generally to provide BDM with an enhanced understanding of the Practitioner's Clients of the Practitioners using



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the Site, as a group of Practitioner's Clients. Such information would only be used in aggregate form and would not contain information of a personally-identifiable nature.

### **3. Consent.**

3.1 By a Practitioner's use of this website, he confirms that: (a) he has sought and obtained the agreement of his Practitioner's Client to the terms and conditions of this Privacy Policy; (b) that the Practitioner's Client consents to BDM's collection of and processing of sensitive / personal data relating to the Practitioner's Client; and (c) that the Practitioner's Client consents to the transfer to the Practitioner by BDM of information which BDM considers relevant in relation to the Pension Relief Service.

3.2 Before releasing the personal data of a Practitioner's Client to any third parties with a right to know, BDM will first require such third parties to agree to use the said personal data in accordance with this Privacy Policy.

### **4. Third parties.**

4.1 Where necessary, BDM may pass to third parties who help BDM in relation to the Pension Relief Service information concerning the Practitioner's Clients.

4.2 In addition to the purpose specified in clause 4.1 above, BDM may share aggregate information with selected third parties concerning Practitioner's Clients, though in this event BDM will disclose neither individual names nor any identifying information.

### **5. Safeguarding of data.**

Except as permitted by this Privacy Policy and unless otherwise required by law, personal information concerning a Practitioner's Client will only be made available to staff of BDM (being only those staff of BDM who need to access the said information in order to provide the Pension Relief Service) and to the Practitioner.

### **6. 'Cookies' and their use.**

It is understood that small items of personal information are stored by one's browser on the hard drive of one's computer and are used to maintain and track information to allow the server to take back information from the browser (which items may be referred to as "Cookies"); accordingly, where the Practitioner's computer is shared with other people, it is recommended by BDM that when the Practitioner signs out of the site he should select the "Don't remember my details" option, as by so doing the Practitioner should remove all details from the Cookie.



## 7. Accessing, Correcting, or Removing your Data.

- 7.1 Practitioner's Clients have the right to check whether BDM holds personal information about them, to access such personal information and to correct any personal information about them that is inaccurate or out-of-date.
- 7.2 Where the disclosing of an item of information would interfere with the privacy rights of another person or where it would breach confidentiality attaching to that item of information, BDM will withhold access from certain portions of the database record pertaining to the Practitioner's Client.
- 7.3 If a Practitioner's Client wishes to exercise his right of access to personal information pertaining to him, or if he wishes to make further inquiries or complaints about the Privacy Policy of BDM, he should either send an e-mail for the attention of the Managing Director of BDM at [info@bradshawdixonmoore.com](mailto:info@bradshawdixonmoore.com) or post a letter to the Managing Director of BDM at Bradshaw Dixon & Moore Limited, P.O. Box 2000, Littlehampton BN16 9BP.
- 7.4 In the event that a Practitioner's Client wishes access to personal information pertaining to him, he will require to verify his identity to BDM.
- 7.5 BDM may make an administrative charge to the Practitioner's Client for providing access to personal information pertaining to him.
- 7.6 It is understood that the processing of an application for access to personal information pertaining to a Practitioner's Client may take up to 30 days.

## 8. Changes to BDM's Privacy Policy.

In the event that BDM makes privacy policy changes (whether for business reasons or because of legislative changes) such alterations will be posted on these Privacy Policy pages and may also be announced via the Site.

