

## Privacy Policy & Cookie Policy

Complaints SOS Limited is dedicated to protecting your personal information.

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

We may need to make changes to our Data Protection and Privacy Policy Notice; so please check with us or go to our website ([www.complaints-sos.co.uk](http://www.complaints-sos.co.uk)) for occasional updates. If there are important changes such as changes to where your personal data will be processed; we will contact you directly.

This version of our Data Protection and Privacy Policy Notice was last revised on 4 August 2020 and applies to Complaints SOS Limited.

### Who we are

We are Complaints SOS Limited. We are regulated by the Claims Management Regulator in respect of regulated claims management activities. Complaints SOS Limited collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with data protection regulation and we are responsible as a data controller of that personal data for the purposes of those laws.

When we mention “the Company”, “Complaints SOS”, “we”, “us” or “our” we are referring to Complaints SOS Limited. We are a Limited company registered in Northern Ireland (NI648039) registered office 2a High Street Holywood Co Down Northern Ireland BT18 9AZ.

### The personal data we collect and use

Information about you that we collect and use includes:

- Information about who you are e.g. your name, date of birth and contact details
- Information connected to your claim e.g. past financial advice documentation and reports
- Information about your contact with us e.g. meetings, phone calls, emails / letters
- Information that is automatically collected e.g. via cookies when you visit one of our websites
- Information classified as ‘sensitive’ personal information e.g. relating to your health, marital or civil partnership status and finances. This information will only be collected and used where it’s needed to provide the product or service you have requested or to comply with our legal obligations
- Information you may provide us about other people e.g. joint applicants or beneficiaries for products you have with us
- Information on children e.g. where a child is named as a beneficiary 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)
- If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.

### Where we collect your information

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

- an application form or terms of business to appoint us as your chosen claim advisers

- a client fact find
- information from organisations that we have been given authority to contact
- phone conversations with us
- emails or letters you send to us
- meetings with one of our staff
- participating in customer satisfaction surveys to help us understand you better and improve our services
- an online web contact form at [www.complaints-sos.co.uk](http://www.complaints-sos.co.uk)
- our online services such as website
- 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 e.g. 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.

### What we collect and use your information for

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 our claims management service
- it's necessary for us to meet our legal or regulatory obligations e.g. to tell you about changes to Terms and Conditions or for the detection and prevention of fraud
- it's in the legitimate interests of Complaints SOS Limited e.g. to deliver appropriate information and guidance so you are aware of the options that you have when processing a claim and understand that are to be taken when processing a claim
- it's in the legitimate interests of a third party e.g. sharing information with your employer's adviser for the governance of a pension scheme of which you are a member

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 claims management services.

### Information collected from other sources

We also obtain personal data from other sources in the course of providing our intermediary services. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources on your behalf may include the following-

- From employers regarding workplace pensions;
- From lenders and/or product providers:
- For product information;
- From pension companies who dealt with the transfer and investment of your SIPP
- From property investment companies
- From identification and verification checking agencies:
- For identity information
- For sanction check information.

### How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> <li>▪ To record you as a new customer</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Performance of identification</li> </ul>	<ul style="list-style-type: none"> <li>▪ Not applicable</li> </ul>
<ul style="list-style-type: none"> <li>▪ To manage our lawful contract and the claims management service we provide, managing of payment, fees and charges if compensation is granted and if required by third parties</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Necessary for our legitimate interests</li> <li>▪ Explicit consent (in respect of Special Categories of Personal Data Only)</li> </ul>	<ul style="list-style-type: none"> <li>▪ FSCS, pension providers, past financial advisers, subsidiaries of past financial advice firms, surveyors, other liable firms or bodies.</li> </ul>
<ul style="list-style-type: none"> <li>▪ To manage our relationship with you which includes:</li> <li>▪ Providing notification of changes to our Privacy or Cookie Policy</li> <li>▪ Requesting feedback from yourself regarding our claims management service</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Signing of a Data Protection and GDPR Notice</li> </ul>	<ul style="list-style-type: none"> <li>▪ Not applicable</li> </ul>
<ul style="list-style-type: none"> <li>▪ To retain records of any services or advice provided to you by us in order to defend potential legal claims or complaints</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>	<ul style="list-style-type: none"> <li>▪ External supplier(s) of data storage and data hosting services to retain records on our behalf</li> </ul>
<ul style="list-style-type: none"> <li>▪ To provide you with details of products and services from us and third parties that may be of interest to you in accordance with your preferences. For more information see 'Marketing' below.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Consent through the use of a Data Protection and GDPR Notice.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Not applicable</li> </ul>

### Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

### We may process:

- health information and lifestyle information when providing claims management services; and/or
- criminal conviction or offence information when providing claims management services

- In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.
- In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

## 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
- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. research, consultancy or technology companies; or companies who can help us in our contact with you, for example an internet service provider
- Our regulators and Supervisory Authority e.g. the Ministry of Justice (MOJ), the Information Commissioner's Office for the UK (the ICO)
- Law enforcement, credit and identity check agencies for the prevention and detection of crime
- HM Revenue & Customs (HMRC) e.g. for the processing of tax relief on pension payments or 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.

## Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and then or have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

- By phone: 028 95 320044
- By email: [help@complaints-sos.co.uk](mailto:help@complaints-sos.co.uk)
- By Post or in person: Complaints SOS Limited, 2a High Street Holywood Co Down BT18 0QD

## Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with intermediary services.

## How long your personal data will be kept

We will keep your personal information only where it is necessary to provide you with our products or services while you are a customer of Complaints SOS Limited and therefore until your client agreement has been terminated.

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.

## Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see 'Your rights' below.

## Your Rights

You have legal rights under data protection regulation in relation to your personal data. These are set out under the below headings:

- To access personal data
- To rectify / erase personal data
- To restrict our use of personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To contest to automated decision making
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

### To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

### To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

## **To restrict our use of personal data**

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

## **To object to how we use personal data**

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

## **To ask us to transfer personal data to another organisation**

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

## **To contest to automated decision making**

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

## To find out more about how we use personal data

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write or call in to Complaints SOS Limited at [help@complaints-sos.co.uk](mailto:help@complaints-sos.co.uk) or Complaints SOS Limited, 2a High Street, Holywood, BT18 9AZ;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

## Keeping your personal data secure

- We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## Cookie Policy

A cookie is a small text file, which often includes a unique identifier that is sent by a web server to your computer, mobile phone or any other internet enabled device when you visit a website. Cookies are saved onto your computer or other device when you visit our website.

Cookies store small pieces of information. For example - they will remember you've visited our website or performed a certain action.

### Cookie Use

We use cookies to help us improve your experience when you visit our website. For example, a cookie might store information so you don't have to keep entering it.

Cookies also let us know which pages of our website you visited; they help us develop and market our products and services.

We use three main types of cookies:

1. ['Performance' cookies](#)
2. ['Identification' cookies](#)
3. ['Targeting' cookies.](#)

1. **'Performance'** cookies are used to help us see how you use our Website e.g. which pages you visit. These cookies don't collect any information that could identify you – all the information collected is anonymous and is only used to help us improve the performance of our Website, understand what interests our users and measure how effective our advertising is. We use performance cookies to analyse the performance of our Website, to help us improve the Website by measuring any errors that occur and to see how effective our adverts are (this isn't shared with 3rd parties). Sometimes cookies are managed for us by third parties, but we

don't allow the third party to use the cookies for any purpose other than those listed above. By using our Website, you accept the use of 'Performance' cookies.

2. 'Identification' cookies are used to help us customize website content based upon your selections. We use identification cookies to remember choices you have made such as identifying yourself as an IFA or Adviser, to show you when you're logged in to the website and to target you with adverts on other websites. You can control whether or not these cookies are used, but preventing them may mean you are unable to access certain features or services. Preventing these cookies may stop us remembering that you didn't want a specific feature or service. By using our Website you accept the use of 'Identification' cookies.

3. 'Targeting' cookies are used to send you relevant information and see which content you use. We use targeting cookies to send you customised news content via email, to track which content you use and to target you with adverts on other websites. By using our Website you accept the use of 'Targeting' cookies. There are third parties that provide Complaints SOS Limited with content and functions on our Website, some of these providers will use cookies to ensure the particular areas on the Website work.

## Controlling Cookies

You have control over if you allow cookies to be used when on our website. If you do not want our website to store cookies on your computer or device then you should refuse when prompted upon visiting our webpage.

Some features may be affected if you do not allow cookies, if this happens you can contact us and we will provide the information or service to you.

You can use your web browser to:

- delete all cookies;
- block all cookies;
- allow all cookies;
- clear all cookies when you close the browser;
- block third-party cookies;
- open a 'private browsing' / 'incognito' session, which allows you to browse the internet without storing local data; and
- install add-ons and plug-ins to extend browser functionality.

## Opting out of cookie use

At any point, you have the right to request that we do not process your personal information for any marketing purposes.

You can opt-out of the Google Display Advertising Features and customise Google Display Network ads using the Ad Settings. As an added privacy measure, you can also use the Google Analytics opt-out browser add-on. However, please note that if you do this you may not be able to use the full functionality of this Website.

To remove other cookies from your PC, you can use these guides:

- Internet Explorer: <https://support.microsoft.com/en-us/kb/278835#/en-us/kb/278835>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Safari: [https://support.apple.com/kb/PH17191?locale=en\\_GB](https://support.apple.com/kb/PH17191?locale=en_GB)
- Firefox: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

## Additional Cookie information

- Cookie Directive: <http://www.ico.gov.uk>
- Information about cookies: <http://www.allaboutcookies.org>



- ️ Internet Advertising Bureau: <http://www.youronlinechoices.eu>
- ️ International Chamber of Commerce United Kingdom: <http://www.iccwbo.uk/pages/privacy>

## **Our Supervisory Authority**

Complaints SOS Limited is Authorised and Regulated by the Financial Conduct Authority. FCA number is 829742.

We will always strive to collect, use and safeguard your personal information in line with data protection laws including the Data Protection Act and GDPR 2018. If you do not believe we have handled your information as set out in our Privacy Policy, please visit our 'Contact Us' page via [www.complaints-sos.co.uk](http://www.complaints-sos.co.uk), and send us a message.

In addition to this, you may contact us by phone on 028 95 320 044, email at [help@complaints-sos.co.uk](mailto:help@complaints-sos.co.uk) or by post or in person - Complaints SOS Limited, 2a High Street, Holywood, Co Down Northern Ireland, BT18 9AZ. We will do our utmost to make things right.

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (ICO). It has enforcement powers and can investigate compliance with data protection regulation ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

## **How to contact us**

If you have any questions about our Data Privacy Notice or the information we collect or use about you, please contact:

Complaints SOS Limited  
2a High Street Holywood  
Co Down  
Northern Ireland BT18 9AZ

Email: [help@complaints-sos.co.uk](mailto:help@complaints-sos.co.uk)

## **Registered Office:**

Complaints SOS Limited  
2a High Street Holywood  
Co Down  
Northern Ireland BT18 9AZ

## **If you need to contact the**

### **Financial Conduct Authority**

General Enquiries      Email: [consumer.queries@fca.org.uk](mailto:consumer.queries@fca.org.uk)

Telephone: 0800 111 6768

## Glossary of Terms

**We, us or our** – Complaints SOS Limited a Limited Company registered in Northern Ireland (NI648039) Registered Office: 2a High Street, Holywood, Co Down, Northern Ireland, BT18 9AZ.

**Contact information** - these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address

**Data controller** - means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with intermediary services

**Data protection regulation** - applicable data privacy and protection laws

**Employment status** - this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance

**Financial Conduct Authority (FCA)**, being the independent watchdog that regulates financial services and the Claims Management Regulator which regulates claims management companies that provide services related to the provision of claims management activities in England & Wales.

**Financial information** - this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60

**Health information** - this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history

**Identity information** - this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number

**Intermediary services** - these are the services we provide to you in relation to the products, which may include workplace pensions.

**Lenders** - a mortgage lender (for a list of current lenders which we work with, please contact us – see How to contact us above)

**Lifestyle information** - this includes both work and leisure behaviour patterns. Most relevant to your products may be your smoker status, alcohol consumption, health, retirement age and exercise habits

**Product** - this is an investment, pension, protection and/or general insurance product in respect of which we provide intermediary services to you

**Product provider** - a company which provides investment, pension, protection and/or general insurance products (for a list of product providers which we work with, please contact us – see How to contact us above)

**Sanction check information** - this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering

**Vulnerability** - a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence).