



PRIVACY POLICY

How we use your information

This privacy notice tells you what to expect when APPI collects personal information. It applies to information we collect about you. To enable us to provide the services we have agreed and for other related purposes – including updating and enhancing customer records, analysis for management purposes and statutory returns, crime prevention and legal & regulatory compliance – we may obtain, use, process and disclose personal data about you.

We may collect and process the following data about you:

- Information that you provide by filing in forms on our site www.theappi.co.uk
- Information that you provide to us by telephone; e-mail or face to face.
- If you contact us, we may keep a copy of that correspondence.

Security and performance

APPI uses a third-party service to help maintain the security and performance of the ICO website. To deliver this service it processes the IP addresses of visitors to our website(s).

People who contact us via social media

We manage our social media interactions internally. If you send us a private or direct message via social media the message will be stored by us for three months. It will not be shared with any other organisations.

People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. We usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer. We may be required to provide a copy of our file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint case.



We are required to disclose to our Advisory and Compliance Board (annually) high level analytics concerning the number and nature of complaints received. This data does not include names or details that identify the specific data subject. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 7 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

People who use our services

APPI provide a range of Services to Data Subjects. We process data provided by the data subject and other sources in order to deliver the appropriate products and services to Data Subjects. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a mortgage to carry out a survey to find out if they are happy with the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

Use of data processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us.

They will hold it securely and retain it for the period we instruct. Our Data processors / Third parties that we use include:

- Legal opinion where required: Wilkin & Chapman
- Regulatory and Compliance opinion where required: Advisory & Compliance Board
- Sanctions and PEPs checking (Anti Money laundering): Advisory & Compliance Board
- Back Office Systems: TBA
- Research Software Tools: TBA
- AES-256 bit data encryption: TBA
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Your rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you. From 25 May 2018 the General Data Protection Regulations (GDPR) come into force.

Access to personal information (Portability)

Data Subjects may submit a Subject Access Request - in order to obtain a copy of the personal data that we hold about them in a structured and portable manner. All SAR requests should be sent to:

Lindsay Hopkins, APPI, 6 Morie Street, London SW18 1SL Email: hello@theappi.co.uk



Confirmation of whether, and where, the controller is processing their personal data

APPI is the Data Controller and a Processor. APPI undertakes data processing within the EEA.

Right of Data subjects to erasure (Right to be forgotten)

Data Subjects may notify the APPI if they wish to exercise their right to erasure. Such a withdrawal of Consent does not affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact. APPI may retain a copy of any personal data and be retained by the Controller if the processing is necessary for the establishment, exercise or defence of legal claims.

Right of rectification

APPI will seek to ensure that inaccurate or incomplete data will be rectified. Data Subjects have the right of rectification.

Right to object to processing for the purposes of Direct Marketing

Data Subjects may notify the Firm if they wish to exercise their right to be removed from any Direct Marketing activities. APPI may still contact the Data Subject in order to fulfil any contractual obligations concerning the policies and services provided.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

Sharing Information with Third Parties

We may share your information with third party service providers such as insurance providers, compliance, and other agents relevant to the business activity.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 25th May 2018.

How to contact us

If you want to request information about our Privacy Policy, you can email us or write to:

APPI 6 Morie Street, London SW18 1SL