



SNAZZIFY

Privacy Notice

Introduction & who we are

For the purpose of data protection laws **Snazzify Ltd** (registered address 52 Wood Mead, Bristol. BS16 1GQ) ("we", "us", "our") is a "data controller" which means we collect and use personal data about you. We also act as a "data processor" on behalf of our clients which means we handle and personal data they have collected as instructed by them for their purpose. This notice provides you with information concerning our collection and use of personal data. If you have any queries regarding this statement, please do not hesitate to contact us - the contact details are below.

Personal data we may collect from you and how we collect it

Personal data you provide to us directly

You may provide personal data to us in a number of ways, including when:

- visiting and browsing our website;
- registering an account for our services;
- completing our "contact us" form on our website or otherwise enquiring about our services;
- engaging with us over the phone (in some instances we will record phone calls with you);
- having an initial 'pre-client' meeting with us to help us understand your requirements;
- subscribing to receive any of our publications or other marketing communications;
- mentioning or interacting with us on social media (for example by following / mentioning / tagging us or by contacting us directly);
- you attend one of our events;
- providing us with feedback about the services we provide; or
- entering into a contract with us and engaging with our services.

What type of data might be included?

The personal data you give us may include but is not limited to:

- your name;
- e-mail address;
- date of birth;
- details of income;
- phone number (including mobile number);
- employment history;
- details of family members or beneficiaries;
- job role;
- pension, investment and other financial details, including your plans for the future;
- health data (for specific services);
- your social media handle and the contents of your post (where you have tagged us or contacted us directly);
- any other information that you provide to us in our provision of services to you; and
- thoughts about our services (including feedback, survey responses, complaints and reviews).

Personal data we collect or generate about you

- When you visit our Site we may collect, generate, store and use certain personal data about you. In some cases we will use cookies to do this, for further information about the cookies we use and how to opt out of such cookies please see our Cookie Policy.
- We may also collect personal data about you if you visit our offices.

The personal data we collect about you may include but is not limited to:

- technical information including: the internet protocol (IP) address used to connect your computer to the internet; your login information (if registering or accessing an account with us); browser type and version; time zone setting; browser plug-in types and versions; device types; operating system; time and date of consent and platform; and any phone number used to call our client service number; and
- information about your visit to our Site including: the full Uniform Resource Locators

(URL); clickstream to, through and from our Site (including date and time); products you viewed, searched for or purchased; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse our Site.

Personal data we receive from other sources.

- Where we are acting as a data processor, we will receive personal data from our clients (such as independent financial advisers) which we will process as instructed by them and in accordance with data protection laws.
- We may occasionally receive personal data about you from other sources, for example, another individual may provide us with your personal data in relation to the services that we are providing jointly to you both (for example, if you are working in a partnership with another person and we are providing services to the joint business).
- We always ask that if you are providing us with the personal data of someone else (for example another partner in a business) that you notify them in advance that their personal data is being shared with us to allow us to provide services to you and you are responsible for directing them to this privacy policy.

How and why, we use your data.

How and why, we use your personal data	What is our legal reason for processing your personal data
<p><i>To provide our services</i></p> <ul style="list-style-type: none">To verify your identity (i.e. to confirm that you are who you say you are).To engage you as a client for the purposes of the relevant service which you instruct us for and to manage our relationship going forwards.To process payments to and from you and to maintain accounts and records of such payments.To notify you about changes to our services and terms and conditions.	<p><i>Legal reason: contract</i></p> <ul style="list-style-type: none">We will have to process your personal data in these ways to perform our contractual obligation with you.Where you provide us with details of a third party (such as a business partner) you are responsible for ensuring that third party is aware that their personal data is being shared and for directing them to this privacy policy.

How and why, we use your personal data	What is our legal reason for processing your personal data
<p>To communicate with you</p> <ul style="list-style-type: none"> To provide you with regular updates on topics relevant to the service we are providing. To carry out market research or similar surveys. To provide you with further information about our other services and our upcoming events To measure or understand the effectiveness of any marketing that we serve to you. 	<p>Legal reason: Legitimate interests</p> <ul style="list-style-type: none"> Where we send marketing to you or otherwise carry out research or analyse our advertising, we will rely on our legitimate interests to send these types of communication (our legitimate interest in marketing and advertising our services) and conduct such activities. You can opt out from marketing communications by using the unsubscribe links within our marketing messages, or by contacting us at any time at the contact details set out at below.
<p>To monitor our website</p> <ul style="list-style-type: none"> To find out more about the visitors to our Site and our client base as a whole (rather than about you as an individual) to ensure that the services that we offer are most likely to interest our Site visitors. Typically the information collected is technical in nature and doesn't tell us about you as an individual (see above). We may use cookies to do this. 	<p>Legal reason: Legitimate interests</p> <ul style="list-style-type: none"> We have a legitimate interest to make sure that we are providing you with the information that we think is most relevant to you. We will not place cookies other than "strictly necessary" cookies on your device unless you have told us that you are happy for us to do so. For information on how we use cookies, please see our Cookie Policy.

Special Category / Sensitive personal data

The personal data that you provide to us may include certain special categories of information that are treated in law as being particularly sensitive (e.g. information related to your health).

We may process this sensitive personal data in order to provide services required from us (e.g. so that advice could be provided regarding IHT and estate planning without understanding whether there are any medical conditions which need to be taken into

consideration). If we use sensitive personal data, we will usually do so on the legal basis that it is in the wider public interest.

Wherever we process sensitive personal data we will ensure that such information is provided with additional safeguards to protect it in accordance with legal obligations.

What if you fail to provide personal data?

If for any reason you failed to provide personal data which we require we may not be able to provide you with the services that you require from us.

Change of purpose

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for a purpose other than that for which it was collected, we will prior to that further processing, provide you with information about the new purpose, we will explain our legal reason for doing so and we will provide you with any relevant further information. We may also issue a new privacy policy to you.

How we share your personal data

Third party suppliers and service providers

Like most businesses, we work with third-party service providers on your behalf to provide the products or the services that you have requested from us. Some of these suppliers will process your personal data on our behalf and provide services to us to enable us to manage our relationship.

We maintain a list of the third-parties that we engage. A copy of this list is available upon request using the contact details below.

We will make sure that these providers meet agreed standards for the protection of your personal data and they will only ever be allowed to use your personal data in order to provide us with services and not for their own commercial purposes. We require all third parties to take appropriate technical and organisational security measures to protect your personal data and to treat it subject to a duty of confidentiality and in accordance with applicable data protection law.

Other scenarios in which we might share your personal data

We may also share your personal data:

- with regulatory, governmental or statutory bodies that we are required (either by law or regulation) to provide personal data to upon their request;
- in the event of any insolvency situation (e.g. administration or liquidation);
- in the event that we consider selling or buying any business or assets, to any prospective sellers or buyers of such business or assets;

- if we, or substantially all of our assets, are acquired by a third party, in which case your personal data will be one of the transferred assets; or
- to protect the rights, property or safety of our employees, workers, contractors, clients, or others. This includes exchanging your personal data with other companies and organisations (including the local police or other local law enforcement agencies) for the purposes of our employee, worker, contractor and client safety, crime prevention, fraud protection and credit risk reduction.

How do we protect your personal data?

- We have put in place physical, technical, operational and administrative, controls and measures to help protect your personal data from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice.
- We will always keep these under review to make sure that the measures we have implemented remain appropriate.
- In addition, we limit access to your personal data to those employees and other third parties who have a business need to know to perform their job duties and responsibilities. They will only process your personal data on our instructions, and they are subject to a duty of confidential.

How long do we keep your personal data?

We will retain your personal data for as long as we need it in connection with our relationship with you. There may also be circumstances where we need to retain your personal data for longer than our relationship with you, for example:

- where we have a legal or regulatory obligation to retain the information; or
- to ensure our business is properly run in an efficient and compliant manner.

Personal data which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal data where applicable.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you. In this case, we may retain such information for a longer period without further notice to you.

Your rights in relation to your personal data

Data protection law grants you several specific rights in respect of your data in addition to the broad and general right to have your data protected. We have set out some information in respect of each of those specific rights, below:

- **Right to be informed** about how your personal data will be processed. This enables you to receive information about how we use your personal data. We have set this information out in this privacy policy.
- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data (commonly known as the "right to be forgotten"). This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal data** to another party.
- **Not to be subject to a decision solely based on automated processing**. We do not anticipate making decisions about you based solely on automated decision making where that decision would have a significant impact on you. If we ever do make a decision about you automatically by a computer or an algorithm without human intervention you can ask us to have that decision reviewed by a human.

If you want to exercise any of the rights set out above, please contact us (using the contact details set out below).

Note on data accuracy: It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes so that our records can be updated. We cannot be held responsible for any errors in your personal data if this is caused by a failure by you to notify us of the relevant change.

Where your personal data may be processed

In some cases, third parties that we engage may transfer personal data outside of the UK or EEA. Where personal data is transferred outside of the UK or EEA, we will ensure that the personal data is provided the required protection when doing so by ensuring adequate

contractual safeguards for such transfer (e.g. the European Commission's standard data protection clauses and UK IDTA Addendum), to ensure the security of your personal data is maintained when it is processed by the third party.

Third-party websites

Our Site may, from time to time, contain links to third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for the ways in which personal data is processed on such websites. Please check the relevant policies before you submit any personal data to these websites.

Changes to this privacy policy

We reserve the right to update or amend this privacy policy at any time, including where we intend to further process your personal data for a purpose other than that for which the personal data was collected or where we intend to process new types of personal data. We will place any updates here on this page. This privacy policy was last updated on 17th April 2025.

Complaints

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your personal data (our details are in the section immediately below). We will try to put things right.

However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to the Information Commissioner's Office ("ICO"). You can contact the ICO on: 0303 123 1113 or via their website <https://ico.org.uk/>

Contact

If you have any questions about this privacy policy or how we handle your personal data, please contact us by sending us an email to hello@snazzify.co.uk