# **Privacy Policy**

**This is the privacy notice of Step By Step Financial Solutions.** In this document, "we" or "us" refers to Step By Step Financial Solutions

Step By Step Financial Solutions is registered in England and Wales under company number 08946989.

Registered office: Unit 314, Solent Business Centre, 343 Millbrook Road West, Southampton, SO15 0HW.

This is a notice to tell you our policy about all information that we record about you. It covers both information that could identify you and information that could not.

We are committed to protect your privacy and confidentiality. We understand that all users of our website need to know that their data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party. Our policy is both specific and strict. It complies with UK law, including the Data Protection Act 1998. If you think our policy falls short of your expectations or that we are failing to abide by our policy, do please tell us.

We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.

Except as set out below, we do not share, or sell, or disclose to a third party, any personally identifiable information collected at this site.

Here is a list of the information we collect from you, either through our website or because you give it to us in some other way, and why it is necessary to collect it:

# **BASIC IDENTIFICATION AND CONTACT INFORMATION**

This information is used:

- to provide you with the services which you request
- for verifying your identity for security purposes
- for marketing our services and products

Information which does not identify any individual may be used in a general way by us or third parties, to provide class information, for example relating to demographics or usage of a particular page or service.

#### MARKET PLACE INFORMATION

When we obtain information from you specifically to enable you to use or buy a service offered on our website by some other person, we assume that in giving us your information, you are also giving us permission to pass it to the relevant person.

#### YOUR DOMAIN NAME AND E-MAIL ADDRESS

Your domain name and e-mail address are recognised by our servers and the pages that you visit are recorded. We shall not under any circumstances divulge your e-mail address to any person who is not an employee or contractor of ours and who does not need to know, either generally or specifically.

#### This information is used:

- to correspond with you or deal with you as you expect
- in a collective way not referable to any individual, for the purpose of quality control and improvement of our site
- to send you news about the services to which you have signed up
- to tell you about other of our services or services of sister websites

#### INFORMATION YOU POST ON OUR WEBSITE

Information you send to us by posting to a forum or blog is stored on our servers. We do not specifically use of that information except to allow it to be read, but you will see in our terms and conditions that we reserve a right to use it in any way we decide.

# WEBSITE USAGE INFORMATION

We may use software embedded in our website (such as JavaScript) to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. This data is not personally identifiable. It is collected by us to improve the service we provide. We do not pass this data to any third party.

#### **BUSINESS AND PERSONAL INFORMATION**

This includes all information given to us in the course of your business and ours, such as information you give us in your capacity as our client. We undertake to preserve the confidentiality of the information and of the terms of our relationship. It is not used for any other purpose. We expect you to reciprocate this policy.

We keep information which forms part of our business record for a minimum of six years. That is because we may need it in some way to support a claim or defence in court. That is also the period within which our tax collecting authorities may demand to know it.

#### THIRD PARTY ADVERTISING

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects your IP address when they send an advertisement that appears on our site to your browser. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

#### **CALLING OUR OFFICE**

When you call our office, we may collect Calling Line Identification (CLI) information. We use this information to help improve the efficiency and effectiveness of our help line. We never pass this information to third parties.

#### **EMAILING US**

Email is not always a secure mode of communication and we provide no guarantee that confidentiality of the information provided in an email will be maintained during transmission.

We will never send you an email asking you to transfer deposit funds. If you <u>ever</u> receive an email from us which provides bank account details for you to transfer money, please speak to us on our main line number to confirm it is genuine.

# SENDING A MESSAGE TO OUR SUPPORT SYSTEM

When you send a message, we collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information and to provide to you the information you need.

We record your request and our reply to increase the efficiency of our organisation. We may keep personally identifiable information associated with your message, such as your name or email address.

#### **COMPLAINING**

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and, if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

#### JOB APPLICATION AND EMPLOYMENT

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

#### **CONTENT YOU PROVIDE TO US**

If you provide information to us with a view to it being read, copied, downloaded or used by other people, we accept no responsibility for what that third party may do with it. It is up to you to satisfy yourself about the privacy level of every person who might see your information. If it is available to all the World, you have no control whatsoever as to how it is used.

#### MARKETING INFORMATION

With your permission we pass your email address and name to selected associates whom we consider may provide services or products you would find useful. You may opt out of this service at any time by instructing us at info@sbsfinance.co.uk.

#### **INFORMATION WE OBTAIN FROM THIRD PARTIES**

Although we do not disclose your personal information to any third party (except as set out in this notice), we do receive data which is indirectly made up from your personal information, from software services such as Google Analytics and others. No such information is identifiable to you.

#### **AFFILIATE INFORMATION**

This is information given to us by you in your capacity as an affiliate of us or a customer or client of ours. Such information is retained for business use only. We undertake to preserve the confidentiality of the information and of the terms of our relationship. It is not used for any other purpose. We expect any affiliate to agree to reciprocate this policy. As an exception to this, we have the right to disclose your first name and URL of your affiliate connection to other affiliates and to any other person or organisation, on and off site. The reason is solely to enable us to mention winners and others whose performance as an affiliate is in some way outstanding.

#### DISCLOSURE TO GOVERNMENT AND THEIR AGENCIES

We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

#### REVIEW OR UPDATE PERSONALLY IDENTIFIABLE INFORMATION

At any time, you may review or update the personally identifiable information that we hold about you by contacting us at the address below. To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your info

Step By Step Financial Solutions, Unit 314, Solent Business Centre, 343 Millbrook Road West, Southampton, SO15 0HW.

# SALE OF YOUR PERSONAL INFORMATION

Except as specified above, we do not rent, sell or otherwise disclose any of your information to any person outside our business.

# DATA MAY BE "PROCESSED" OUTSIDE THE UK

Our websites are hosted in the EU. We also use outsourced services in countries outside the EU from time to time in other aspects of our business. Accordingly, data obtained within the UK may be "processed" outside the UK and data obtained in any other country may be processed within or outside that country.

## **COMPLIANCE WITH THE LAW**

This privacy policy has been compiled so as to comply with the law of every jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your country, we should like to hear from you, but ultimately it is your choice as to whether you wish to use our website.

#### **REMOVAL OF YOUR INFORMATION**

If you wish us to remove personally identifiable information from our website, you may contact us at <a href="mailto:info@sbsfinance.co.uk">info@sbsfinance.co.uk</a>. To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.

#### **JURISDICTION**

Disputes relating to the use of our website will be subject to the jurisdiction of the English courts.

#### **COPYRIGHT**

All material on our website which has been created by us is subject to copyright under UK law and we reserve all rights associated with that content. Parts of the website may be downloaded for personal use only. You are not entitled to reproduce or modify content subject to copyright, in whole or in part, for any commercial use whatsoever, without our prior written permission.

## **ACCURACY OF WEBSITE CONTENT**

Although we endeavour to ensure that all of the information on our website is accurate and up to date, we do not guarantee that that is the case.

#### **FINANCIAL ADVICE**

No information on our website constitutes financial advice. If you require financial advice, please contact us.

# **PROTECTION OF LOG IN DETAILS**

We have security procedures in place to protect your log in details as well as your personal information, but it is your responsibility to ensure that you do not give out your log in details to any other person, and to ensure that you log out of our website and delete browser history before logging off if you are using a shared computer.

If you have any questions regarding this privacy policy, please contact us at info@sbsfinance.co.uk