



LIGHTHOUSEGROUP

**ADVISER CANDIDATE
PRIVACY STATEMENT**

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This statement outlines our Privacy Statement and the way Lighthouse Advisory Services Limited treats your data in line with General Data Protection Regulation (GDPR). Any reference to Lighthouse Advisory Services Ltd includes all Appointed Representative firms, trading styles, the company and all associated group companies.

This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

If you have any questions about the statement or your rights under GDPR, please contact gdpr@lighthousegroup.plc.uk.

About Lighthouse Advisory Services Ltd

As the principal regulatory firm, Lighthouse Advisory Services Ltd ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant Data Protection Regulation and laws.

Lighthouse Advisory Services Ltd's registered office is at 26 Throgmorton Street, London EC2N 2AN and we are a company registered in England and Wales under company number 04086645.

Lighthouse Advisory Services Ltd is an FCA authorised firm under reference number 195199.

We are registered on the Information Commissioner's Office Register, registration number Z5282730.

How Lighthouse Advisory Services Ltd uses your personal information

Lighthouse Advisory Services Ltd processes your personal information to meet our legal, statutory and contractual obligations in relation to you applying to be considered for FCA Authorisation within the Group, advisory services and any wider data use.

We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

Your information will be held by Lighthouse Advisory Services Ltd as Data Controller.

How we use your personal information

This privacy notice is to let you know how Lighthouse Advisory Services Ltd promise to look after your personal information. This includes what you tell us about yourself and what we learn by having you when you apply to become an adviser within our group of companies. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

How the law protects you

As well as our Privacy Statement, your privacy is protected by law. This section explains how that works. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Lighthouse Advisory Services Ltd.

In order to use your personal data, the law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. Even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

What data do we collect?

The tables below shows the data we collect and the reasons for the use of that data including any legitimate interests.

Data	Legal Basis – Legal Obligation
Passport number, Visa Permit Number, Face, photos (from your Passport) and handwriting, Birthplace & Nationality	<p>To meet a Legal Obligation</p> <p>To comply with FCA Fit & Proper Test (FIT) Rules for Approved Persons;</p> <p>To verify your identity.</p>
Qualifications and Grades, Statement of Professional Standing (not applicable to Mortgage Advisers) & Continuous Professional Development (CPD) Records	<p>To meet a Legal Obligation & Legitimate Interest (see below)</p> <p>To comply with FCA Fit & Proper Test (FIT) Rules for Approved Persons;</p> <p>To comply with FCA Training & Competence Rules for Approved Persons.</p>

As explained above, a legitimate interest is when we have a business or commercial reason to use your information. Even then, it must not unfairly go against what is right and best for you. We are relying on legitimate interest to process the data shown below:

Data Categories	Legal Basis – Legitimate Interest
<p>Contact details including: Full name, home address, email address & telephone number</p> <p>Job Position/Title, Work Details, Salary and previous earnings (if self employed);</p> <p>Login name, screen name, nickname, or handle (for psychometric profiling systems or recruitment assessment systems)</p> <p>Qualifications and Grades, Statement of Professional Standing, Continuous Professional Development Records</p>	<p>To meet a Legitimate Interest</p> <p>To allow Lighthouse Advisory Services Ltd to contact you via email and telephone during the recruitment process;</p> <p>To assist with recruitment and selection;</p> <p>To assist with performance assessment.</p> <p>To assist with the assessment of competence as part of the recruitment process.</p>

Legitimate Interests

As noted in the above table, we process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment to ensure that we have weighed your interests and any risk posed to you against our own interests, ensuring that they are proportionate and appropriate.

Sensitive (Special) Data.

There are additional provisions relating to the processing of 'sensitive personal data'. Sensitive personal data will not be disclosed to a third party without your explicit consent. We will only collect and use the following types of data if the law allows us to do so and we have your consent to do so:

- Criminal convictions and offences

The sensitive and special data we process is as follows:

Data	Legal Basis – Legal Obligation
Criminal convictions and offences	Legal Obligation: To meet our obligations to the Financial Conduct Authority for Fitness and Propriety of Approved Persons (FCA FIT Rules).

Criminal Convictions and Offences

We may need to conduct Disclosure and Barring Service Checks as part of the screening for adviser appointment or employment and under the FCA Fitness and Propriety of Approved Persons (FCA FIT rules) for regulated individuals. This only applies to FCA Regulated functions and your explicit consent will be sought if a check is required. The check will be conducted by an external and Disclosure & Barring Service Umbrella Body and the results will be processed in line with the strict criteria applied to this type of data, with access restricted to HR only with the use limited to FCA FIT requirements. Any data held in relation to convictions will be deleted in line with the Retention Policy (How long will we keep your data?).

Consent for Special Categories Data

Owing to the products, services or treatments that we offer, Lighthouse Advisory Services Ltd sometimes needs to process sensitive personal information (*known as special category data*) about you.

Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a signed consent form. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

Data we do not collect

We do not collect or use the following types of data on you as our adviser:

- Marital status
- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Genetic and bio-metric data

How we collect your data

At the point we contact you to consider appointment with Lighthouse Advisory Services Limited: We collect information from your CV and any other supporting application documentation you provide including qualification certificates.

At the point you formally apply to join Lighthouse Advisory Services Limited: When it is mutually agreed that you will progress to a formal application with Lighthouse Advisory Services Limited, we will issue a regulated recruitment pack, including a full **Adviser Privacy Statement** showing what data will be collected and how it will be processed and shared from the point you complete and return the pack to us.

With whom do we share your data

Personal information held by ourselves may be disclosed to third parties on a confidential basis, and in accordance with relevant data protection law. We may share your data with the following third parties:

Third Parties

Regulatory & Legal:

The Financial Conduct Authority – for the purposes of management and oversight of Approved Persons;
Law enforcement agencies – we would be under legal obligation to co-operate with law enforcement agencies in the event of alleged criminal activity.

Recruitment:

HR Recruitment Management Software provider (SimplyPersonnel) – for the administration and management of recruitment.

Psychometric Profiling Providers – for the purposes of recruitment.

Training & Competence:

Accredited Bodies i.e. The CII - FCA T&C Rules for the management, recording and collating of adviser competence and qualifications and verification of CPD records;

CPD Management System Provider (Competent Adviser) – FCA T&C Rules for the management, recording and collating of adviser CPD records.

We may also share your personal information if the make-up of Lighthouse Advisory Services Ltd changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets or we may seek to acquire other businesses or merge with them;
- During any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private;
- If a change to our Group happens, then other parties may use your data in the same way as set out in this notice.

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot fulfil our obligations to you as your Principal Firm.

Any data collection that is optional and where your informed consent is needed will be made clear at the point of collection.

Third Party information provided by you

If you provide any information about a third party (such as spouse or dependants) who are not party to this agreement, you are confirming that you have their consent to share their data with us for the purposes of Emergency Contact, Next of Kin or Locum purposes.

Record keeping

We keep records of all your FCA Authorisation or period of appointment information. You, or your appointed agent, have the right to inspect the records at a mutually convenient time.

As we treat all our adviser records as confidential, we reserve the right to not give you copies of your records where in certain circumstances releasing the original would compromise other third party's confidentiality.

How long will we keep your data?

We will keep your FCA Authorisation or period of appointment data for only (a) as long as necessary and (b) in line with all legislation and the Adviser Retention Policy; normally this is for your lifespan in line with the rights of clients regarding claims and redress and Lighthouse Advisory Services Ltd.'s duty of care to the client.

Should you not proceed to a formal application, your information will be removed after a period of 12 months.

Your Rights

You have the right to access any personal information that Lighthouse Advisory Services Ltd, as your FCA principal firm processes about you and to request information about: -

- What personal data we hold about you;
- The purposes of the processing;
- The categories of personal data concerned;
- The recipients to whom the personal data has/will be disclosed;
- How long we intend to store your personal data for;
- If we did not collect the data directly from you, information about the source.

Incomplete or Inaccurate Data: If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

Erasure of your Data: You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws, as well as to object to any direct marketing from us.

Data Portability: Where applicable, you have the right to data portability of your information. This means we provide you with your data in a format that can be transferred to another Data Controller.

Automated Decision Making: You have the right to be informed about any automated decision-making we may use. We do not use any automated decision making.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request to ensure that your data is protected and kept secure.

Your right to a copy of your personal information: Under current data protection law, you have a right to get a copy of the personal information that we hold about you.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and

'right to erasure', or the 'right to be forgotten'. There may be legal or other official reasons why we need to keep or use your data. However, please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate;
- It has been used unlawfully but you do not want us to delete it;
- It is not relevant any more, but you want us to keep it for use in legal claims;
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to continue using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us.

How to withdraw your consent

You have the right at any time to contact us to withdraw your consent to collecting future personal data or us holding existing data but this will affect our ability to fulfil our legal obligations to you and the ability to progress with a regulated application for FCA Authorisation. The consequences of your withdrawal of consent would be provided to you at that time.

IT Safeguarding Measures

Lighthouse Advisory Services Ltd employs a holistic security strategy to protect your data from inadvertent or deliberate data loss. This includes, but is not limited to Centralised Internet Security, Local security, end-point encryption, email secure messaging, security of applications and Security information and events management. Full details of the IT security measures are available on request.

Transfers outside the EU (if applicable)

Third party service providers may administer advisory services and provide other services from centres in countries outside the European Economic Area (the "EEA") (such as India and the USA) that do not always have the same standard of data protection laws as the UK. However, they are required to put a contract in place that ensures that your information is adequately protected, and they will remain bound by their obligations under the relevant data protection law even when your personal information is processed outside the EEA.

If we do transfer your information to a service provider or third party outside the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We will use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA;
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA;
- For data sent to the USA, transfer it only to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU. It makes sure those standards are similar to what is used within the EEA.

Contact details

Should you have any questions regarding this Privacy Statement or your rights under the **General Data Protection Regulation**, please contact:

GDPR
Lighthouse Advisory Services Ltd
3rd Floor Highbank House
Exchange Street
Stockport

SK3 0ET

Email: gdpr@lighthousegroup.plc.uk

How to complain

Please let us know if you are unhappy with how we have used your personal information. Please refer to the Lighthouse Advisory Services Ltd contact details above.

You also have the right to complain to the Information Commissioner's Office. Find out how on their website <https://ico.org.uk/concerns/> or call their helpline on 0303 123 1113.