

Fathom Financial Consulting's Privacy Statement

This privacy notice informs you how Fathom Financial Consulting promises to look after your personal information. We will not sell, rent, or lease your data to third parties.

If you have any questions or concerns regarding this statement, you should contact us using the details given at the end of this statement under 'Contact details'.

Introduction

We are committed to protecting and respecting your privacy and complying with the General Data Protection Regulation 2018. Fathom is a Data Controller in terms of this regulation.

This statement sets out our privacy policy and explains what we do with the personal information that we collect from our users. Please read the following to understand our views and practices regarding personal information. This includes what you tell us about yourself, what we learn by interacting with you as our client, and the choices you make concerning information you want us to send to you. This privacy notice explains how we do this, and informs you of your privacy rights, and how the law protects you.

How the law protects you

As well as our privacy policy, 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 proper reason to do so. This includes sharing it outside of Fathom Financial Consulting with third parties. The law says that we must have one or more of the following reasons:

- To fulfil a contract we have with you;
- When it is our legal duty;
- When it is in our legitimate interests;
- 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 inform you what that is.

Below is a table of all the ways that we may use your personal information, and which of the reasons we rely on to do so, and what our legitimate interests are in each case.

| What we use your personal information for | Our reasons | Our legitimate interests |
|---|---|---|
| <p>To manage our relationship with your business</p> <p>To develop new ways to meet our clients' needs and grow our business</p> <p>To develop and carry out marketing activities</p> <p>To provide advice/guidance about our products and services</p> | <p>Your consent</p> <p>Fulfilling contracts</p> <p>Our legitimate interests</p> <p>Our legal duty</p> | <p>Keeping our records up to date, working out which products and services may interest you, and informing you about these</p> <p>Developing products and services, and what we charge for them</p> <p>Identifying and defining types of customers for new products and services</p> <p>Seeking your consent when we need it to contact you</p> <p>Being efficient and compliant about how we fulfil our legal duties</p> |
| <p>To develop and manage our products and services</p> <p>To manage how we work with other companies that provide products and services to us and our customers</p> | <p>Fulfilling our contracts</p> <p>Our legitimate interests</p> <p>Our legal duty</p> | <p>Developing products and services, and what we charge for them</p> <p>Identifying and defining types of customers for new products and services</p> <p>Being efficient and compliant about how we fulfil our legal duties</p> |

| | | |
|--|--------------------------|--|
| To deliver our products and services | Fulfilling our contracts | Being efficient and compliant about how we fulfil our legal duties |
| To manage invoices for customer accounts | Our legitimate interests | Complying with regulations that apply to us |
| To collect and recover money that is owed to us | Our legal duty | |
| To obey laws and regulations that apply to us | Our legitimate interests | Being efficient and compliant about how we fulfil our legal duties |
| To respond to complaints and seek to resolve them | Our legal duty | Complying with regulations that apply to us |
| To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. | Our legitimate interests | Being efficient and compliant about how we fulfil our legal duties |
| | Our legal duty | Complying with regulations that apply to us |
| To exercise our rights set out in agreements or contracts. | Fulfilling our contracts | |

Types of Personal Information

We use different kinds of personal information, and group them together as follows:

| Type of Personal Information | Description |
|------------------------------|--|
| Employment | Your current and past employment location and position. |
| Contact | Where you work and how to contact you. |
| Contractual | Details about the products or services we provide to you. |
| Behavioural | Details about how you use our products and services. |
| Technical | Details on website usage, and readership. |
| Communications | What we learn about you from letters, emails and conversations between us. |
| Usage Data | Other data about how you use our products and services. |
| Consents | Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you. |

Where we collect personal information from

We may collect personal information about you and/or your business from the following sources

- 1) Data you provide to us:
 - When you enquire about our products and services
 - When you enter a contract for our products and services
 - When you contact us via phone, email and letter
 - When you use our website, mobile application devices, or any other online services
 - In interviews
 - In client surveys
 - If you take part in any marketing promotions
- 2) Data we collect when you use our services:
 - Payment and transactional data
 - Profile and usage data (the profile used to identify yourself when you connect to our internet and mobile services, and data on how you use these services using cookies and other internet tracking software)
- 3) Data from third parties we work with:
 - Companies/individuals that introduce you to us
 - Public information sources such as Companies House
 - Third parties working on our behalf
 - Government and law enforcement agencies
 - Market researchers

Who we share your personal information with

We may share your personal information with the following organisations:

- Organisations who we use to help run products and services, and explore new ways of doing business

- HM Revenue & Customs, regulators and other authorities
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to cooperate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Companies you ask us to share your data with

We may also share your personal information if the make-up of Fathom Financial Consulting 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 occurs in this manner, then other parties may use your data in the same way as set out in this notice.

Sending data outside of the EEA

Fathom will not transfer your personal data to a country outside the European Economic Area without your prior consent and without first having assessed the adequacy of protection for individual rights in respect of personal data available in that country.

We will only send data outside of the European Economic Area (EEA) in order to:

- Follow instructions you provide us with
- Comply with a legal duty
- Work with third parties who we use to help fulfil contracts and provide products and services.

If we do transfer information outside of 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.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

You can find out more about data protection on the European Commission Justice website.

What happens if you choose not to provide 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 provide this personal information, it may delay or prevent us from meeting these obligations and may mean we cannot provide products and services needed to fulfil a contract you have with us.

We sometimes ask for information that is useful, but not required by law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it will not affect the products or services you have with us.

Marketing

We may use your personal information to inform you about relevant products and services we offer. This personal information is sourced from data you have told us, data we have collected when you use our services, or from third parties that we work with.

We review this information to inform you of products and services that may be of interest to you. We can only use your personal information to send you marketing messages if we have either your consent or a legitimate interest (business or commercial reason(s) to use your information). It must not be in conflict with what is right and best for you.

You may ask us to stop sending marketing messages by contacting Fathom Financial Consulting at any time. Important information such as changes to your existing products and services will still be provided. If you change your mind you can update your choices by contacting us again.

If there are changes in the law, regulation or the structure of our business, we will ask you to confirm or update your choices in the future.

How long we keep your personal information for

We will keep your personal information for as long as you are a client of Fathom Financial Consulting. If you stop being a client, we may keep your data for up to 10 years under the following reasons:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records according to rules that apply to us

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory, or technical reasons. We may also keep it for research or statistical purposes. In each case, your privacy is protected and your data will only be used for these purposes.

How to request a copy of your information

You may request a copy of your personal information held by Fathom Financial Consulting by writing to us at the following address:

*The Data Protection Officer,
Fathom Financial Consulting Limited,
47 Beveden Street,
London,
N1 6BH*

Or you can use the [electronic contact form](#) which can be found at the bottom of our Cookies and Website Policy.

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us using the contact information under 'Contact details' if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

What to do 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. As a data subject under GDPR this constitutes your 'right to object', your 'right to erasure', and your 'right to be forgotten'.

There may remain legal or official reasons why we must keep or use your data. We sometimes may be able to restrict the use of your data, such that it is only used for these purposes. In this situation, we would not share your information whilst it is restricted.

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

- It is inaccurate
- 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 legal reasons
- You have already asked us to stop using your data, but you are waiting for us to tell you if we are allowed to keep using it

If you would like to object to how we use your data, or ask us to delete or restrict it, please contact us using the contact information under 'Contact details'.

How to withdraw consent

You can withdraw your consent at any time. Please contact us using the contact information under 'Contact details' if you wish to do so. Please note if you withdraw your consent, we may not be able to provide certain products or services to you. If this is the case, we will inform you.

How to complain

Please let us know if you are unhappy with how your personal information is used. You can contact us using the contact information under 'Contact details' to raise a complaint. You also have the legal right to complain to the Information Commissioner's Office. You can find out more about the process on the ICO's website: <https://ico.org.uk/concerns/>

Formats for sharing data and right of access

As of 25 May 2018 you have the right to request the records of your personal information held by Fathom Financial Consulting. This will be provided in a format that can be easily re-used. If you submit an electronic request, you will be provided with your information in a commonly used electronic format. You may also ask us to pass on your personal information in this format to other organisations.

We will provide this information free of charge, unless it constitutes a request that is manifestly unfounded, or is considered to be excessive (particularly if it is repetitive). Fees may be charged if requests for further copies of the same information are submitted and will be based on the administrative costs of providing the information.

If you request information under your right of access, Fathom Financial Consulting will provide this within one month of receipt. If requests are complex or numerous, this may be extended up to two months, and you will be informed of the reasons why the extension is necessary.

We may also refuse to respond to requests that are manifestly unfounded or excessive. If this is the case, we will inform you of this and of your right to complain to the ICO.

Cookies and Website Policy

Please see our 'Cookies and Website Policy' for further information (<https://www.fathom-consulting.com/privacy-policy/>).

Changes to the privacy policy

We reserve the right to modify or amend this privacy policy at any time and for any reason. Details of any changes will be posted at the top of the privacy policy web page.

Contact Details

Contact Address:

*Fathom Financial Consulting Limited,
47 Beviden Street,
London,
N1 6BH*

Email: enquiries@fathom-consulting.com

Tel: +44 (0) 20 7796 9561