

## Data protection policy summary

This document outlines how New Financial processes and manages data. It:

1. identifies our data controller and designated data protection officer
2. provides our lawful basis for processing data
3. outlines the scope of data we hold and process
4. outlines the scope of the special category data we hold and process
5. describes and justifies our data retention policy
6. shows how we intend to respond to Subject Access Requests and
7. contains a copy of our privacy notice.

### Data controller and data protection officer

New Financial is registered with the Information Commissioner's Office (ICO), membership number ZA059335 as a Data Controller. New Financial has appointed William Wright, managing director as Data Protection Officer.

### Lawful basis for processing

Data is processed primarily under the lawful basis of legitimate interests. It has a limited privacy impact. We undertake to always act within the reasonable expectations of any individuals about whom we hold personal data.

### Data we hold

As of 18th May 2018, New Financial's database holds information on approximately 10,000 individuals. Data is stored electronically and securely on a secure cloud.

New Financial uses the CRM (Customer Relationship Management) System [Insightly](#), to manage data related to our core activity; research reports and our programme of events.

This information primarily includes but is not limited to:

- Names, job titles, company names
- Company addresses.
- Company and some personal email addresses.
- Business and mobile telephone numbers.

### Tracking Technologies

New Financial may use cookies and pixel tags to automatically collect information through our website and emails.

**Cookies.** Cookies are small text files placed in visitors' computer browsers. These technologies are used in analysing trends, administering the Site, tracking users' movements around the Site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Site, but your ability to use some features or areas of our Site may be limited.

**Pixel Tags.** A pixel tag is a piece of code embedded on an email that collects information about users' engagement with the email. Pixel tags allow us to record, for example, that a user has opened an email or an attachment.

### Staff

In addition, New Financial stores details of all personnel according to its legal obligations electronically and in paper format in locked cabinets. This information predominantly includes but is not limited to:

- Names, addresses and email addresses.
- Telephone numbers.
- National Insurance Numbers, Passport Numbers, Driver Licence Numbers.

### Data retention policy

All data we hold has a limited privacy impact and will be retained for the purposes of contacting you in the course of our normal activity and for historical, statistical or research purposes as outlined above unless its disposal is requested.

### Subject access requests

We will comply with Subject Access Requests in line with the guidance given by the ICO.

- We will respond as quickly as possible, within 30 calendar days.
- We will request verification of the identity of any individual making a request and ask for further clarification and details if needed.
- Data subjects have the right to the following:
  - To be told whether any personal data is being processed
  - To be given a description of the personal data, the reasons it is being processed and whether it will be given to other organisations or people.
  - To be given a copy of the information comprising the data and given details of the source of the data where this is available.

### Privacy notice

New Financial will undertake to ensure that all individuals for whom we hold data can have the opportunity to read our privacy notice. We will:

- Publish our privacy notice on the website at [www.newfinancial.eu](http://www.newfinancial.eu)