
CUSHON PRIVACY POLICY

BACKGROUND:

Cushon understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.cushon.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means Smarter Financial Services LLP, trading as Cushon and authorised and regulated by the Financial Conduct Authority with FRN 602533 and is registered in England and Wales with company number 0C337856. Smarter Financial Services (Holdings) Limited, trading as Cushon, is registered in England and Wales with company number 10967805. Our registered office address is Highdale, Headley Road, Leatherhead, England, KT22 8QE.

2. Information About Us

- 2.1 Our Site is operated by Us.
- 2.2 We are authorised and regulated by the Financial Conduct Authority with Firm Reference Number 602533.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected,

stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please update via your account or contact Us using the details in section 14);
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (Please note that we are required by financial services regulations to hold your data for at least 5 years after you cease to be a customer. If you would like Us to delete your data after this period has expired, please contact Us using the details in section 14);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to Us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies):

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 name of your employer;
- 5.5 email address;
- 5.6 mobile telephone number;
- 5.7 national insurance number;

- 5.8 debit / credit card number;
- 5.9 bank account details;
- 5.10 current address and address history;
- 5.11 IP address;
- 5.12 web browser type and version;
- 5.13 operating system;
- 5.14 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Site;
 - 6.2.3 Personalising and tailoring your experience on Our Site;
 - 6.2.4 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
 - 6.2.5 Personalising and tailoring Our products and services for you;
 - 6.2.6 Replying to emails from you;
 - 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by selecting the unsubscribe link in the email);
 - 6.2.8 Market research;
 - 6.2.9 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message and post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
 - 6.6.1 data will be retained for the minimum period required by FCA regulation, which is currently five years after you cease to be a customer.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 We will only store your data within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data include:
 - 7.4.1 We follow the OWASP Security Code of Conduct for web applications
 - 7.4.2 We aim to meet the criteria for PCI compliance
 - 7.4.3 We follow the Origo standards for security of financial services applications.
 - 7.4.4 All personally identifiable information is encrypted within our systems both in transit and at rest
 - 7.4.5 We use 2048 bit SSL encryption for website access
 - 7.4.6 All passwords are encrypted using an one-way algorithm which means not even we can know what your passwords is
 - 7.4.7 We double-verify all transactions and changes in details via SMS, so even if someone steals a your password they can't access your money
 - 7.4.8 We triple-verify any password resets via email, SMS and security questions, so even if someone steals a your phone they can't reset your password

8. Do We Share Your Data?

- 8.1 We may share your data with other companies in Our group for the purposes set out in section 6. This includes Our subsidiaries, Our holding company and its subsidiaries.
- 8.2 We may share your data with your employer, or with the providers of your employee benefit platform, for the purpose of delivering our service, improving our service, and to enable them to give you a combined picture of all your benefits.
- 8.3 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of

goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

- 8.4 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.5 We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 8.6 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

10. How Can You Control Your Data?

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your Right to Withhold Information

- 11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict Our use of Cookies. For more information, see section 13.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please log in to your Account to access your data.

13. Our Use of Cookies

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 13.2 By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.
- 13.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 13.4 Before Cookies are placed on your computer or device, you will be shown a popup requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 13.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.6. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.10, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 13.6 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Cushon	We use this to remember information across different pages as you navigate around our site. For example, so we remember who you are after you've logged into your account, and to remember which investment you are buying when you choose to set up an account.	Yes
consentedToCookies	We use this to track whether you have consented to cookies	Yes
_gid	This is provided by Google to help us keep track of how you are using the site	No
_ga	This is provided by Google to help us keep track of how you are using the site	No
_gat	This is provided by Google to manage the rate at which page views are submitted to its servers	No
gac	This is provided by Google to help us keep track of the effectiveness of our advertising	No
__tawkuid	This is provided by our webchat provider to enable our webchat service	No
TawkConnectionTime	This is provided by our webchat provider to enable our webchat service	No
Tawk_	This is provided by our webchat provider to enable our webchat service	No

- 13.7 Our Site uses analytics services provided by Google. This is a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used and to improve Our Site and the products and services offered through it. The analytics service used by Our Site uses Cookies to gather the required information. You do not have to allow Us to use these Cookies.
- 13.8 Our Site uses webchat services provided by TawkTo. This enables us to offer immediate support if you need it. The webchat service use Cookies to gather the required information. You do not have to allow Us to use these Cookies.
- 13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site

more quickly and efficiently including, but not limited to, login and personalisation settings.

- 13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us using the contact details on our website. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above). Please note that for security reasons we will require you to log into your Account in order to obtain your personal data.

15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.