



Privacy Policy

Last updated 7th June 2023

Privacy Statement Summary

Who will use my data?	Adviser Technologies Limited. Trading as Adviser.ai with the websites Onlinehelp.co.uk and Adviserhelp.com.
What for?	<p>We enable our clients to provide product guidance to you online through our online software. We enable our clients to send text messages and emails to their existing marketing databases inviting their customers to use our software.</p> <p>If you are an individual of our clients we will send, collect, process and store your data on their behalf using our websites onlinehelp.co.uk (in the UK) and adviserhelp.com (in the US and ROW).</p> <p>We then pass any additional details that you provide as part of our online guidance software back to our clients to allow them to contact you regarding their services where appropriate.</p> <p>If you are a company we will use your data to market services to you as a potential client of our services via email, telephone, social media and our website adviser.ai.</p>
What will happen if I contact you?	<p>If you contact us as an individual, we will pass on your information to the client on behalf of whom we are servicing.</p> <p>If you contact us as a company we will use your information to respond to your query or request as appropriate.</p>
What data will be stored and for how long?	<p>For individuals; we will store the information provided by our clients (which includes your name, email address and mobile phone number) for a period long enough to execute their marketing campaigns to you, but no greater than 6 months after they have uploaded it.</p> <p>If you have not used the software then at 6 months your personally identifying data will be deleted.</p> <p>If you have used the software we will hold your data – including any additional information you enter as part of the guidance process – for 6</p>

	<p>months after the date at which you used the system, after which your name, email and phone number will be anonymised.</p> <p>We retain non-personally identifying aggregate data to enable us to improve our service for our clients.</p> <p>The exception to this is opt-outs. For any opt-out request we will retain your email and phone number to ensure that no further marketing campaigns from that client or any other client can be sent to you.</p> <p>For potential and existing clients; we will store any data enabling us to market our services to our clients and the individuals within those companies and to respond to requests.</p>
<p>What data will be shared?</p>	<p>We will not share your data with any third parties or company other than the client in question who has used our system for the purposes of marketing to you.</p> <p>We may need to share your information with any regulator or legal body that requests it.</p>
<p>Who can access my data?</p>	<p>Access to your data with our clients will be limited to managers within the company using our software to market to you, and the specific adviser at that company trying to contact you.</p> <p>Selected technical staff at Adviser Technologies Limited will also have access to your data but only for development and customer service purposes.</p> <p>We will never sell, share or otherwise distribute your data to any other third party.</p>
<p>How is my data kept secure?</p>	<p>We will store your data on secure UK-based servers. We use industry standard security protocols/technology to secure data at all times. For more information please see a copy of our internal data protection policy.</p>

We take your privacy seriously and will only use your personal information to respond to your request and as required to run our business. As a potential client, we may from time to time send you information about services you may be interested in. We will never sell, share or use your personal information other than as described here.

About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Adviser Technologies Limited t/as Adviser.ai. The General Data Protection Regulation 2016/679 and the UK Data Protection Act 2018 (together, the “**GDPR**”) describe how organisations must collect, handle, process and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously. This document describes our approach to data protection.

This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

Who We Are And How To Contact Us

Adviser.ai is a trading name of Adviser Technologies Limited, a company that is registered in the United Kingdom and is registered with the Information Commissioner's Office (ICO). The data controller is Adviser Technologies Limited and the Data Protection Officer is Luke Ashworth. You can contact us in any of the following ways:

Email: help@adviser.ai

Phone: 020 8050 1295

Website: www.adviser.ai

Post: Kemp House, 160 City Road, London, EC1V 2NX

Our registration number with the ICO is ZA474755.

Who this privacy policy applies to

Adviser.ai is operated by Adviser Technologies Limited. It is an automated guidance platform for telesales teams operated through two websites; www.onlinehelp.co.uk in the UK and www.adviserhelp.com in the US and the ROW.

This policy relates to users of the Adviser.ai software via this website. Processing of your data is required in order to run our company and to offer our services to our clients. This policy applies to individuals whose data has been submitted to us as either a customer, employee, supplier or in any other capacity, and to individuals whose data we are processing on behalf of our clients as part of providing the platform for them to offer automated guidance.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals, and other identity data, including first name and last name
- Postal addresses
- Email Addresses
- Telephone numbers
- Personal information
- Financial information
- Transaction data, including details about other services you may have engaged with
- Employment, Family and Health details
- Other information as required to provide our services and operate our company

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this policy and will never be used for any purpose other than the intended legitimate interest of our clients.

What this policy applies to

This section describes the lawful basis for processing data and applies to information about individuals that we collect, store, or process for all sources. This includes:

- Information you provide when you contact us in order to discuss using our services as a client
- Information our client's provide to us to collect, process and store on their behalf
- Information we collect about how you use our websites as either a client or an individual
- Information that is given and stored as part of any ongoing relationship either as a client or an individual related to each client
- Information we collect for our Clients as part of our automated online guidance services

Where we collect or process sensitive data, we will take appropriate precautions with this data. Where we do collect special categories of personal data it will be limited information regarding your health and lifestyle to enable the Adviser at our client to offer you the best service. We will be very unlikely to take other special categories of personal data (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or genetic and biometric data) unless it is necessary to do so for our business, in such case we will obtain your specific consent, unless we have another lawful basis to do so.

How your information will be used

We will only use personal data for the purposes for which we either collected it or were supplied to it for processing and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new client on our platform to deliver online guidance services to your customers	(a) Identity, (b) Contact	Performance of a contract with you
To process and deliver the services you request as a client including managing payments, fees and charges, and to collect and recover money owed to us.	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us
To manage our ongoing relationship with you which will include notifying you about changes to our terms, services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you as a company client and measure and understand the effectiveness of our	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our services, to develop them, to grow our business and to inform our

advertising		marketing strategy
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	Necessary for our legitimate interests to develop our services and grow our business
As an individual customer to enable our clients to provide automated guidance to you in regards to their products and services	(a) Identity, (b) Contact, (c) Financial, (d) Lifestyle, (e) Professional, (f) other information as required	Necessary for our legitimate interests to develop our services and grow our business

Specifically for clients (businesses using our software)

In accordance with your preferences and the law, we may use your personal information to provide you with information about services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the services, promotions and offers that are likely to be of particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

- Information that our clients provide to us when registering with our website (including email address, contact details, and any other details provided)
- Information that you provide when completing an online form
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us
- Information relating to any use you make of our services, including any other transaction details (including your address, telephone number and financial details)
- Information we collect about you from other sources such as directories, social media, third-party databases, and other companies

Data we receive will be used for the purposes it was provided, including:

- To respond to queries regarding the possible use of our services
- To carry out our obligations arising from any contracts entered into between our clients and us including the provision of services, and to respond to queries regarding those contracts
- To manage and administer the relationships between our clients and us
- To obtain feedback

Scope of Agreement

By submitting your personal data on this site or as required for us to provide services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

How to exercise your rights as an individual

If we have collected, stored, or processed your data from a client as part of running our business we will at all times respect your rights as an individual and ensure we meet our obligations professionally and courteously. We operate in line with GDPR guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at any time.

We generally rely on your consent to collect, store and process your personal data; however, one of the following bases may also apply to permit us to deal with your personal data:

- a) processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
- b) processing is necessary for compliance with a legal obligation to which we are subject;
- c) processing is necessary to protect the vital interests of you or of another natural person;
- d) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- e) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our financial payments, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child.

Opting out at a later date

As a client; where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing data, you can contact us to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. If you have made a call request but then also opt out of further marketing, your data will still be made available to the adviser at the client for the purposes of your call request but you will receive no further automated communication.

As an individual; we rely on your consent for us to process your data having been given as part of your agreement with them before they use our software to contact you. However, you can contact us directly to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. At such a point our client will also be notified immediately of your request.

We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

How we store and process your data

If you are being contacted by a UK-based client all data will be collected, stored and processed in the UK only using the website [onlinehelp.co.uk](https://www.onlinehelp.co.uk). We do not transfer your data outside the UK. Any personally identifying data will generally not be stored for more than 6 months after the end of any relationship to ensure we have records of service and other interactions we have with you.

If you are being contacted by a US-based client all data will be collected, stored and processed in the UK using the website adviserhelp.com. We will not transfer your data outside the UK. Any personally identifying data will generally not be stored for more than 6 months after the end of any relationship to ensure we have records of service and other interactions we have with you while still relevant for our client to access. For US-based clients there may be some rare circumstances where we are required to transfer your data back to the US clients, and where this happens, we will ensure our services have a similar level of protection as the UK.

We will only use your personal data for the purposes for which we collected it or for which our clients have requested as part of their processing requirements. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our websites. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality by legal contract.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Our obligations to our clients

We are the data controller in relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR (2018) in the way we use and share your personal data. Under certain circumstances, you have rights under the data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Our obligations to individuals

We are the data processor in relation to the information that we handle on behalf of our clients. We are legally responsible for how that information is handled. We will comply with the GDPR (2018) in the way we use and share your personal data. Under certain circumstances, you have rights under the data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Third Parties

As an individual on behalf of our clients we will never share your personal data with a third party unless obligated to do so by law.

As a client we may share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Third parties as required to run our business and provide our services to our clients.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. We do not use cookies in providing Adviser.ai to you.

[Links to other sites](#)

Please note that this policy will not apply to other websites that you may link to from our website or the websites of our clients. 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 such other websites before providing any data to them

Legitimate Interests

We have completed a Legitimate Interest Assessment and as such we have determined that our processing is reasonable and the rights of any individual are not adversely affected. We take these rights seriously and will review this assessment regularly.

Automated Decision-Making and Profiling

In the event that we use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on you, you have the right to challenge to such decisions under GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from us.

This right does not apply in the following circumstances:

- a) the decision is necessary for the entry into, or performance of, a contract between you and us;
- b) the decision is authorised by law; or
- c) you have given you explicit consent.

Where we use your personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.

Changes

If we change this policy, we will post the changes on this page. If we decide to, we may also email you.

Contacting us, exercising your information rights and complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact us at: Adviser Technologies Limited t/as Adviser.ai, Kemp House, 160 City Road, London, EC1V 2NX. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
www.ico.org.uk