



February 2018

# Briggs Murray Privacy Policy

How and why we collect personal  
data



Clark Stalham

BRIGGS MURRAY ACTUARIAL & BRIGGS MURRAY WEALTH

# Document Control

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Version	Date	Name	Comments
0.1	7 <sup>th</sup> Feb 2018	Clark Stalham	Initial Draft
1.0	24 <sup>th</sup> May 2018	Clark Stalham	Final

## Authorisations

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Name	Position	Date Signed Off
Clark Stalham	IT Manager	24 <sup>th</sup> May 2018
Nathan Murray	Briggs Murray Wealth	24 <sup>th</sup> May 2018
Robert Briggs	Briggs Murray Actuarial	24 <sup>th</sup> May 2018

# Introduction

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This privacy policy sets out how Briggs Murray Actuarial Ltd & Briggs Murray Wealth & Financial Planning Ltd uses and protects any information that you give us when you use this website.

Briggs Murray Actuarial Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

## Our core beliefs regarding user privacy and Data Protection

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User privacy and data protection are human rights

We have a duty of care to the people within our data

Data is a liability, it should only be collected and processed when absolutely necessary

We loathe spam as much as you do!

We will never sell, rent or otherwise distribute or make public your personal information

# Relevant Legislation

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Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

[UK Data Protection Act 1988 \(DPA\)](#)

[EU Data Protection Directive 1995 \(DPD\)](#)

[EU General Data Protection Regulation 2018 \(GDPR\)](#)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found later in this policy) for clarification.

## Personal Information this website collects and why we collect it

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This website collects and uses personal information for the following reasons

### Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see Our 3<sup>rd</sup> Party data processes section below).

GA makes use of cookies, details of which can be found on [Google's developer guides](#). FYI our website uses the analytics.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

If you log in to this website then your session is captured by our underlying case management system which is used to process any orders you may place with us. This system is in house and does not track your IP address but does record the date and time you logged in and out of the system, along with any information you passed to us as part of the ordering process.

Session ID's allow you to navigate around the site once you have logged in and disabling cookies may cause unexpected consequences when ordering services from us

## Ordering services from us

By logging on to this website you have the ability to order services from us. The login process and the ordering system use our in house case management system.

We store the fact that you have raised an order with us, the time that order was placed and the information you submitted as part of the order process.

None of the data that you supply will be passed to or be processed by any of the third party data processors defined in this document The data is transmitted over an SSL connection and then decrypted by our system for visibility to our staff. The data is stored in an encrypted SQL Server database at a datacentre located in Germany.

# How we store your personal information

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As detailed above, if you logon to this website some personal information will be stored within this website's database. This is currently the only occasion where personal data will be stored on this website. This data is currently stored in an identifiable fashion; a limitation of the case management system that this website is built on (vFire). In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

## About this websites servers

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This website is hosted by Amazon Web Services (AWS) in a Data Centre located in Germany.

AWS provides robust data security with the following key points

- Access Controls – Server and database access is controlled to only allow authorised administrators
- Monitoring & Logging – All activity by authorised individuals is logged and monitored
- Encryption – All server activity and databases are encrypted at rest with AES256

All traffic between this website and your browser is encrypted and delivered over HTTPS

# Our 3<sup>rd</sup> Party Data Processors

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We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in the Legislation section. Both of these third parties are based in the USA and are [EU-U.S Privacy Shield](#) compliant.

Google ([Privacy policy](#))

Amazon Web Services ([Privacy policy](#))

## Data Breaches

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We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

## Data Controller

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The data controller of this website is: Briggs Murray Actuarial, a UK Private limited Company with company number: 09526772

Whose registered office is:  
Regus House,  
Herons Way,  
Chester Business Park,  
Chester.  
CH4 9QR

## Data Protection Officer

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You can contact our Data Protection Officer by emailing [DPO@briggs-murray.com](mailto:DPO@briggs-murray.com)

## Changes to our Privacy Policy

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This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.