

1. INTRODUCTION

We are The Openwork Partnership, a trading style of Openwork Limited - Auckland House, Lydiard Fields, Swindon, SN5 8UB (ICO Registration Reference Z8925674), one of the UK's largest networks of financial advisers.

Here at The Openwork Partnership, we care about privacy, with a strong focus on building trust and delivering peace of mind to our clients, protecting their data and individual rights.

This privacy notice gives you a clear view of who we are, how we collect, share and use the personal information you provide us, and how we protect your data to the highest standard.

We also want to make you fully aware of the rights and choices you have to control your personal information and protect your privacy.

2. SCOPE OF THIS PRIVACY NOTICE

This privacy notice covers The Openwork Partnership, and all of its partners and subsidiaries, including the Zurich Advice Network and all other legacy legal entities by which the network was previously known, (together, "Openwork" or the "Group") on how they collect, processes and use your personal information whether that is face to face, over the phone, online or via an Openwork or appointed representatives (AR) firm's Website(s), in accordance with UK privacy and data protection laws - namely the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), the Data Protection Act 2018 (DPA 2018), and UK General Data Protection Regulation (UK GDPR).

Openwork must also adhere to rules issued by the Financial Conduct Authority (FCA) on data security. Our financial advisory services are delivered by our network of financial advisers based in our appointed representatives (AR) firms.

Openwork operates under a "Joint Controllership" relationship with our AR Firms, whereby we jointly determine the purposes and means of processing our clients' personal data. Openwork also has access to personal information that Openwork's AR firms collect and use via Openwork's centralised IT systems.

Within this joint controller arrangement, both Openwork and its AR firms share responsibility for complying with appropriate privacy and data protection laws and partner together to ensure we have the right measures in place, protecting our clients' data and establishing a foundation of trust, to be maintained on an ongoing basis.

Throughout the remainder of this notice, "we" and "our" shall therefore refer inclusively to "Openwork" and its AR Firms in partnership as joint controllers.

Separate privacy policies exist for candidates and colleagues employed by Openwork and its AR firms and are made available to those individuals separately from this privacy notice.

3. HOW DO WE OBTAIN YOUR INFORMATION?

Your information may come to us from a number of different sources. You may provide it directly to us when using our services, it may be generated in the course of using those services or it may be publicly available information.

Information may be provided directly by you in some of the following circumstances:

- As part of our advisers' fact-finding meeting and any other meetings with you

- When you complete a form, register to receive communications or provide information on our website
- When you contact us and provide information over the telephone
- When you send us information as part of on-going service delivery

Other examples of where Openwork obtains your personal information from include:

- Where you are referred to us by an independent introducer, they will ask for your agreement to send this information to us to provide you with advice and guidance
- Personal information about you and your family, collected from other parties such as policy providers
- Information about you provided by our clients where it is necessary to do so e.g. as a beneficial owner of their assets or as an individual making payments to their account
- Information provided by legal firms in relation to legal proceedings
- Where information is collected via cookies on our website
- Where we access your publicly available contact details online e.g. to contact you about a service of interest

Where personal data is provided to us by a third party, we will make sure that these third parties have been transparent with you, providing a clear explanation on how this data will be shared with Openwork and have a lawful reason for doing so. Where this is found not to be the case, we will make every effort to make sure you are aware that we are processing this information within a month. Where contacting you directly in relation to this is difficult to achieve, then we will ensure that our privacy notices clearly detail where this is happening.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this privacy notice.

More information on our current uses of data from different sources is detailed below.

4. HOW DO WE USE YOUR INFORMATION?

This section describes how we use your information. Each purpose is described below with detail relating to:

- Why we collect this information (**Purpose**)
- What personal and potentially more sensitive data we collect for this purpose (**Information**)
- The source of this data, i.e. was this provided by you or obtained from another source (**Source**)
- What legal basis Openwork has under the UK General Data Protection Regulation and Data Protection Act 2018 for using your data in this way (**Legal Basis**)

As a client of Openwork

Purpose:	To provide financial advice and services to clients (corporate, mortgage, protection or wealth clients) and to complete transactions on their behalf.
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Information:	Data about you and your family's circumstances including personal contact details such as name, title, addresses, telephone numbers and personal email addresses; date of birth; gender; marital status and dependents; next of kin; national insurance number; bank account details, payroll records and tax status information; salary, annual leave, pension and benefits information; financial circumstances and current policies; corporate information relevant to the transaction; employee, member and contractor details relevant to the transaction; copy of driving licence, passport, payslips, utility bills and bank statements; photographs; information about your health, including any medical condition, health and sickness records.
Source:	Provided by individual as part of taking out financial services with Openwork.
Legal Basis:	For the performance of a contract or to take steps to enter into a contract with you. Any health information required during applications for insurance products (e.g. life insurance, pensions, sickness, etc.) is processed for reasons of public interest in relation to insurance. Any other processing of sensitive or special categories data will be carried out with your explicit consent.

Supporting clients with additional needs

Purpose:	In line with Financial Conduct Authority guidance, to ensure vulnerable clients are protected and firms consider vulnerable characteristics for product design, service, pre and post advice and complaints procedures.
Information:	In addition to data collected for all Openwork clients, this will include information on specific area of vulnerability in relation to health, lifestyle, resilience or capability factors and level of additional support required. This may include more sensitive information volunteered by you, as part of discussions around services or support requirements e.g. in relation to race, ethnicity, religious beliefs or sexual orientation.
Source:	Based on information provided by the client, client family members or their representatives.
Legal Basis:	As part of Openwork's legitimate interest in ensuring clients are effectively supported whilst being provided with financial services. Any processing or sharing of sensitive or special categories data such as health data in relation to supporting clients will be carried out with your explicit consent or that of your representative.

Beneficial owners and third-party payments

Purpose:	In line with Anti Money Laundering legislation, to keep a register of beneficial owners i.e. individuals with a controlling interest in a privately held business and to carry out appropriate checks on individuals making payments to your account.
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Information:	Name, address, contact details, proof of ID, source of funds and financial crime check results.
Source:	Based on information provided by an Openwork client in relation to any beneficial owner of their assets or individuals making payments to their account.
Legal Basis:	Necessary for the compliance with a legal obligation, namely the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and for reasons of public interest in relation to suspicion of terrorist financing, financial crime or money laundering.

Assistance to legal firms

Purpose:	To provide appropriate advice to a legal firm who has sought guidance relating to financial products for an individual who is party to legal proceedings in which the legal firm is involved, and where the individual is not a client of Openwork (such as pension sharing audits).
Information:	Potentially any client data that may inform this assessment (see "As a Client of Openwork's" section).
Source:	Based on information provided by the legal firm in relation to the relevant proceedings.
Legal Basis:	As part of Openwork's legitimate interest in ensuring that its response to the legal firm is accurate and appropriate and to support processing of special categories data for the establishment, exercise or defence of legal claims.

Other legal matters

Purpose:	To deal with legal claims and on-going litigation cases.
Information:	Names of individual involved in relevant legal matter and any relevant information in relation to that individual that may be relevant to the case.
Source:	Provided by you as part of any on-going legal matter.
Legal Basis:	Necessary for compliance with a legal obligation and for the establishment, exercise or defence of legal claims.

Anti money laundering

Purpose:	To make checks with third party agencies to authenticate and verify your identity and to apply these checks to sanction lists for the purposes of meeting with the
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Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

- Information:** Name, address, contact details and customer due diligence report (ID match and politically exposed person, sanction lists and global adverse media checks). ID matches will include the processing of sensitive biometric data from photographic images for ID verification purposes.
- Source:** Provided by you as part of being a client of Openwork's.
- Legal Basis:** Necessary for the compliance with a legal obligation, namely the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and for reasons of public interest in relation to suspicion of terrorist financing or money laundering.

Marketing Communications and providing information on the work of Openwork

- Purpose:** To send you email notifications you have specifically requested in relation to Openwork's services and communications such as newsletters and bulletins. To send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications and/or you wish to withdraw your consent).
- Information:** Email address, postal address, job title, organisation name, consent status for receiving marketing materials.
- Source:** Provided by you as part of accessing Openwork services or attending Openwork events.
- Legal Basis:** As part of Openwork's legitimate interests where information is sent in paper form, or in certain situations where it is permitted under PECR in electronic form. Based on explicit consent provided by you, where required under PECR, for this information to be sent to you in electronic form.

Dealing with your enquiry or a complaint

- Purpose:** To allow Openwork to effectively deal with any enquiry or complaint you or others may have.
- Information:** Name, contact email and telephone number and nature of the enquiry or complaint. Personal data of complainants and respondents.
- Source:** Provided by you and others via our website, social media channels, telephone or in writing. Potentially provided by another organisation that we have contacted about

a complaint you have made and who gives us your personal information in its response or a complainant may refer to you in their complaint correspondence.

Legal Basis: As part of Openwork's legitimate interests. This will only be carried out in a way that balances the rights and interests of individuals against the legitimate interests of Openwork.

Dealing with individual rights

Purpose: To allow Openwork to respond to requests under the UK GDPR for individuals to exercise their rights e.g. to access their own data, request erasure of data, object to processing, etc.

Information: Provided by you via our website, social media channels, via email, telephone or in writing.

Source: Provided by you via our website, as part of a consultation, telephone or in writing.

Legal Basis: Openwork is legally obliged under the UK GDPR to respond to data subject requests.

Managing data breaches

Purpose: To be able to assess any impact on individuals of a data breach involving personal data held on Openwork systems or on third party systems.

Information: Any information relating to an individual that may have been breached.

Source: From any organisation or individual that may have reported this data breach to Openwork.

Legal Basis: Openwork is legally required under UK GDPR to respond to data breaches appropriately.

Supplier management

Purpose: To ensure appropriate financial management of on-going contracts with Openwork suppliers including sending statements, invoices and payment reminders to you, and collecting payments from you.

Information: Suppliers name, email, contact numbers and financial documentation such as purchase order, invoices etc.

Source: Provided by the supplier organisation or generated by Openwork.

Legal Basis: In order to manage the on-going contract with that supplier.

Improving the use of our website and IT systems

Purpose:	To ensure appropriate system administration and troubleshooting of website issues, to track the pages you have visited in order to improve the quality of the site and to personalise the website experience. To keep track of and solve issues users are experiencing with our technology systems, personalising our website for you, enabling your use of the services available on our website, keeping our website secure and preventing fraud.
Information:	User's IP Address or the location of your computer or network on the internet and any individual's data needed to deal with an internal system issue (where the issue is linked to that individual's data).
Source:	Automatically collected as part of using our website and via cookies on the website (See our separate cookie notice for more information) and identified by Openwork in managing specific IT issues.
Legal Basis:	Explicit consent is sought for use of cookies when you access our website. Methods of turning off cookies can be found in our separate cookie notice. Ensuring our systems are working effectively and user issues can be resolved is part of our legitimate interests in running the organisation effectively.

Anonymous data records

We may create anonymous data records from your personal data by excluding information (such as your name) that make the data personally identifiable to you. We use this anonymous data (no longer linked to you) to analyse our products and services. We reserve the right to use such anonymous data for any purpose and disclose anonymous data to third parties, including but not limited to our research partners, at our sole discretion.

5. AUTOMATED DECISION MAKING AND PROFILING

In certain circumstances we may process your personal data through automated decision-making, including profiling. This may include segmenting and tailoring the data to enable us to match our communication and products to your perceived needs. In the case we process your personal information through automated decision-making, we will inform you about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Section 10 **"YOUR RIGHTS"** below outlines your rights relating to the automated decision making and profiling.

6. Artificial Intelligence (AI)

We may use artificial intelligence (AI) systems to help us provide our services, improve efficiency, and enhance your experience. For example, we may use AI tools to analyse information, support decision-making, or assist with routine administrative tasks.

When we use AI, we do so in accordance with data protection law. We ensure that:

- AI tools are used responsibly and with appropriate human oversight.
- Any personal data processed by AI systems is handled securely and only for lawful purposes.
- We assess the impact of AI systems to ensure they do not unfairly affect your rights or freedoms.
- You have the right to request information about how AI has been used in relation to your personal data, and to object to certain types of automated processing.

We do not make solely automated decisions that have a legal or similarly significant effect on you without human involvement.

7. THIRD PARTIES TO WHOM WE PROVIDE YOUR PERSONAL DATA

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as is reasonably necessary for the purposes set out in this privacy notice.

We may also share your data with third parties to perform services on your behalf.

Types of third parties who may have access to your personal data include:

- **Intra-group sharing**
We may share your information between the different companies, brands and AR firms within our group, for the purposes set out in this privacy notice. As stated above, this privacy notice applies to The Openwork Partnership Group, including all of its partners and subsidiaries. For more information about us, and other entities within The Openwork Partnership family, please visit www.theopenworkpartnership.com.
- **Other professional service providers**
Depending on the instructions we receive from you, we may pass your data to other professionals to enable us to provide advice most suited to your circumstances. We will always notify you if we are going to share your information in this way and these professionals would all be based within the UK. Usually, this would be referrals to accountants, solicitors, tax advisers and sometimes to specialist advisers in the financial and insurance industry where you may benefit from the expertise of such third parties. We, and any third-party specialist advisers to whom we introduce you, will pass your data to the relevant organisations if you agree to purchase or amend policies and products.
- **The Financial Conduct Authority**
We may be required to share your information with our regulator, the Financial Conduct Authority, or the Financial Ombudsman and other third parties including our auditors or insurers.
- **ID authentication agencies**
We will make checks with third party agencies to authenticate and verify your identity. These checks will also cover global adverse media checks, politically exposed person and sanction lists. Any personal data obtained for the purposes of meeting with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 will only be processed for the purposes of preventing money laundering, financial crime or terrorist financing, unless the use of the data is permitted by or under another enactment other than those regulations, or otherwise where consent has been obtained from you.

- **Insurance/mortgage providers**

We also make checks with organisations with which you have policies of insurance and investments and with your mortgage provider. These checks are to help us with our legal obligations and to ensure that we provide you with advice that suits your circumstances. The scope and extent of the gathering of information from third parties depends on what type of service you are taking from us.

- **Purchasers/investors**

We may share your information with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets or who are stakeholders or investors in our business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this notice.

- **Advertisers and data exchanges**

We may share your information with advertisers (where we are permitted to do so) and data exchanges, so that we can offer you tailored content, including more relevant advertising for products and services which may be of interest to you. These third parties may set and access their own cookies, web beacons and similar tracking technologies on your device in order to deliver customized content and advertising to you when you visit Openwork websites.

- **Social Networks**

Our websites and/or applications may also allow you to log in using a social network or other third-party account. An example of a third-party login is "Log in with Facebook". Logging into one of our sites with your social network or other third-party account may allow us to gather information that you give us permission to access from that social network or third party. The login feature may also transfer information to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically collect information such as your IP address, information about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of, and your use of, the login is governed by the privacy notice and terms of the party that provided the login functionality, rather than this privacy notice.

- **Other third parties**

- (1) Third Party IT System Suppliers who may host your data on their systems and may need some level of access to resolve technical concerns.
- (2) Solicitors, counsel and claimants in relation to legal matters.
- (3) Accountants in relation to finance matters.

We may disclose your personal information:

- to the extent that we are required to do by law
- in connection with any on-going or prospective legal proceedings
- in order to establish, exercise or defend our legal rights (including providing information to others for the purpose 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 an authority would be reasonably likely to order disclosure of that personal information

We will never sell or share your personal information with other organisations for their direct marketing purposes without your explicit consent. Except as provided in this notice, we will not provide your personal information to other third parties.

We require all third parties to respect the security of your personal data and to treat it in accordance with data protection laws. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. INTERNATIONAL TRANSFERS

We will only send personal data collected within the UK to foreign countries in limited circumstances such as to follow your instructions, to comply with a legal duty or to work with our suppliers, agents and advisers who we use to help run our business and services.

If we do transfer personal data outside of the UK, we will only do so to countries deemed by the UK to have adequate data protection laws or where we are satisfied that the personal data will be sufficiently protected in the destination country and through appropriate safeguards such as approved standard data protection contractual clauses.

9. PROTECTING YOUR PERSONAL INFORMATION

We are committed to protecting your personal information and implementing appropriate technical and organisational security measures to protect it against any accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access and against all other unlawful forms of processing.

We store all your personal data in highly secure software systems and when we share your personal data with third parties we do so in a safe and secure manner.

When collecting or transferring Sensitive Personal Information we use a variety of additional security technologies and procedures to help protect this information.

When we process highly confidential information (such as credit card numbers) over the Internet, we protect it through the use of encryption.

10. HOW LONG DO WE KEEP YOUR DATA FOR?

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

Personal data that we process for any purpose will not be kept for longer than is necessary for that purpose. Different purposes will have different retention periods, and we will (for example) retain data about financial records longer than we would retain information for general enquiries.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Notwithstanding the other provisions of this section, we will retain your personal data:

- To the extent that we are required to do so by law;
- If we believe that the information may be relevant to any on-going 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); or
- To support the on-going business purposes of Openwork as specified above (with due consideration for the rights and freedoms of individuals' privacy).

If you would like further details of how your personal data is retained by Openwork, please contact us directly.

11. YOUR RIGHTS

Under Data Protection Law, you have a number of rights relating to your personal data. The rights available to you depend on our reason for processing your information. You have the following rights:

- The right to be informed about how and why your data is being used;
- The right to access (and receive a copy of) your personal data;
- The right to have any of your data you believe to be inaccurate or incomplete, rectified or completed;
- The right to the erasure of your personal data (also known as the right to be forgotten);
- The right to restrict how your personal data is being processed;
- The right to data portability (e.g. transferring your data to a third party in appropriate format).
- The right to object to processing of your personal data (including profiling) based on Openwork's legitimate business interests;
- The right to withdraw your consent to data being processed about you (where processing is on the basis of your consent);
- The right to object to decisions being taken solely by automated means, including profiling;
- The right to make a complaint to the regulator (the ICO) about your data being processed.

To exercise any of these rights please [click here](#) and complete our online form.

Alternatively, you can get in touch using the details set out in section 13 **"how to contact us"** below.

12. DATA PROTECTION COMPLAINT PROCESS

Complaints regarding data protection matters should be addressed to the Data Protection Team at dataprotection@theopenworkpartnership.com or complete our [Complaint web form](#)

The Data Protection Team will:

- Log and acknowledge your complaint within 30 days of receipt.
- Fully investigate your complaint and provide you with an outcome letter without undue delay.

If you are not satisfied with the response to your complaint, you may raise the matter with the [Information Commission](#).

13. HOW TO CONTACT US

Please contact us if you have any questions about our privacy notice or information we hold about you:

By email: dataprotection@theopenworkpartnership.com

or write to us at:

Data Protection Officer

The Openwork Partnership
Auckland House
Lydiard Fields
Swindon,
SN5 8UB

You can also contact your Openwork AR Firm directly using the contact details they have provided you (typically available to you on their headed paper or within the signatures of any email communication they send) if you would like any information about how they collect, store or use your personal information

14. CHANGES TO OUR PRIVACY NOTICE

From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, other developments or new products and services being offered.

We keep our privacy notice under regular review and we will place any updates on this web page.

This privacy notice was last updated on 07/10/2026

15. DOCUMENT CONTROL

Version	Date	Author	Key changes
1.0	04.10.2024	Sam Benson	Creation

1.1	07.11.2024	Sam Benson	Replaced references to “privacy policy” with “privacy notice” throughout document.
1.2	19.11.2024	Sam Benson	- Openwork Limited updated as controller with ICO registration details included. - Various other changes applied based on feedback from stakeholders during review process. Separate feedback tracker available for more detail on specific changes made. - Slight changes to marketing communications section to clarify marketing based on legitimate interests. - Openwork Limited updated as controller with ICO registration details included. - Public interest legal basis added for processing of health information for insurance purposes.
1.3	21.01.2025	Sam Benson	Link to online webform added in section 10.
1.4	21.11.2025	Stephan Swanepoel	AI Use transparency added. One deletion of line under Retention periods
1.5	15.04.2026	Stephan Swanepoel	Complaint procedure added due to changes to Data Protection Act via the Data (Use and Access) Act 2025. More transparency of sharing VC data to ensure good outcome for clients
1.6	07/10/2026	Stephan Swanepoel	Name change for ICO from Information Commissioner’s Office to Information Commission

Review frequency	Annually, or in the event of significant change or a significant incident
Retention Period	2 years
Author	
Notice Owner and Approver	The notice is owned by the Privacy & Data Protection Team. The notice is approved by the Privacy & Data Protection Working Group.

Reviewed by

The Privacy & Data Protection Working Group and invited Subject Matter Experts (SMEs)