

## Protection Terms of Business

If you would like this document in larger print or in another format, please contact us

### OUR PROMISE

AS Financial aim to be a cut above the rest. We pride ourselves on our professional service, treating our clients fairly and most important of all, using simple and understandable terms to give our advice.

As part of this promise, AS Financial is regulated as an **independent** mortgage and protection advisor by the Financial Conduct Authority (FCA), 12 Endeavour Square, London E20 1JN. Our Regulatory Number is 527263. Our contact details are:

Elm Yard, 10-16 Elm Street  
London  
WC1X 0BJ  
Tel: 020 3301 6690  
Email: info@as-financial.com

This document is in respect of your protection services only. In order to make sure you receive the most suitable policy for your needs, AS Financial is able to advise on the widest range of products available to protection intermediaries.

The table below shows the protection policies that we do and don't advise on:

### PROTECTION

DO	DON'T
Life Assurance	General Insurance  We do have a preferred partner, Safe and Secure. More details can be found at <a href="http://www.safeandsecure-ins.com">www.safeandsecure-ins.com</a>
Income Protection	Unemployment
Critical Illness	Any protection with an investment element
Accident and Sickness	

## WHAT WE DO FOR YOU AND OUR FEES

<b>STAGE 1</b>	
Undertake a detailed consultation where we seek to understand your current situation and ascertain exactly what you are looking for. You will receive some initial thoughts, potential options and some indicative advice.	<b>NO FEE</b>
<b>STAGE 2</b>	
Undertake bespoke research on your behalf.	<b>NO FEE</b>
<b>STAGE 3</b>	
Recommend a provider and product in writing. We will also conduct a presentation meeting to take you through the Key Facts Illustration (KFI) which details all the important information you need.	<b>NO FEE</b>
<b>STAGE 4</b>	
Make a full application to the recommended provider on your behalf.	<b>NO FEE</b>
<b>STAGE 5</b>	
Produce a statement of demands and needs detailing our recommendation.	<b>NO FEE</b>
<b>STAGE 6</b>	
Answer any queries the provider may have and process the application to "on risk".	<b>NO FEE TO YOU</b> At this stage the provider will pay any commission to us.

We will usually receive commission from the protection provider we recommend. Details of this will be included in your KFI.

AS Financial spend considerable time assessing and advising our clients. We are able to cover the cost of our advice via the commission paid by the provider. However, should you cancel the policy within 2 years of inception, the provider will seek to recover the commission paid to us. In order to make sure we are paid fairly for our work, we therefore charge a cancellation fee equal to 12 months premiums should you cancel the policy within 24 months.

We will, of course, be delighted to discuss the reasons you may be considering cancellation and work with you to make sure you do not suffer this cost. This policy does not affect your right to cancel the policy within 30 days of inception free of charge.

## YOU:

- are responsible for providing all instructions in writing.
- are responsible for the information you give to your adviser. Please note that the information on the application form is crucial to a successful claim. Please therefore check this carefully.
- should retain the confirmation documentation we send you as a record of the advice given.
- should check that the terms offered are affordable to you.

Our advice will be based on the information that you give, so it is important that you provide us with accurate and up-to-date information when we request details about your circumstances and objectives. This will allow us to provide you with the appropriate advice. If you limit the information provided it could affect the suitability of the advice we give.

## COMMUNICATING WITH YOU

We will communicate with you in English usually via email as well as via your personal portal where we will upload all your documents for your reference. To ensure we carry out your instructions accurately, to help us to continually improve our service and in the interests of security, we will record your telephone communications with us.

## CONFLICTS OF INTEREST

Although we will always try to act in your best interests, there may be situations where we or one of our other customers has some form of interest in the business being transacted for you. If this happens or we become aware that our interests or those of one of our other customer conflict with your own interests, we will write to you and ask for your consent to proceed before we carry out any business for you. We will also let you know the steps we will take to make sure you are treated fairly.

## COMPLAINTS

In the unlikely event you wish to make complaint, AS Financial operates a fully regulated complaints handling process. In the first instance, please direct your complaint in writing to Saul Conway at [saul@as-financial.com](mailto:saul@as-financial.com). If you are not happy with our response, the Financial Ombudsman Service (FOS) may be able to help. The FOS settles disputes between financial services business and their customers. Full details are available at [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk).

- The Financial Services Compensation Scheme (FSCS) is the UK's statutory compensation fund for customers of authorised financial services firms who are unable to pay claims made against them, usually because they have gone out of business. In the majority of cases, eligible claims related to advising and arranging of protection products are covered for either 90% or 100% of the claim, without any upper limit. Further information is available from the FSCS at [www.fscs.org.uk](http://www.fscs.org.uk).

## DATA PROTECTION

To provide our services properly, we'll need to collect information on your personal and financial circumstances. We take your privacy seriously and will only use personal information to deliver our services. For further details on how we process personal data, please refer to the Privacy Notice at the foot of this document.



## CLIENT CONSENT

We recommend you read these terms carefully. If you do not understand any point please ask for clarification.

We deem you to have given consent to these terms by continuing to undertake your transaction through AS Financial.



## Privacy Notice

AS Financial Limited is part of Atlantic Swiss Group of companies which includes ASFC LLP and Black Frame Consulting LLP. This privacy notice explains what personal information we may collect from you in the course of providing our services and how it will be used.

### **What information do we collect about you?**

We collect information about you when you engage us for mortgage advice services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you provide feedback to us.

### **Information about connected individuals**

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us.

### **Why do we need to collect and use your personal data?**

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required, we'll obtain your explicit consent in order to collect and process this information.

### **How will we use the information about you?**

We collect information about you in order to provide you with the services for which you engage us.

### **Who might we share your information with?**

We won't share your information for marketing purposes with companies outside our group of companies / other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.



### **How long do we keep hold of your information?**

During the course of our relationship with you we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship.

We're also subject to regulatory requirements to retain your data for specified a minimum period of three years.

This is a minimum period, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

### **How can I access the information you hold about me?**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us using the contact details noted below.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

### **Cookies**

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

### **Other websites**

Our website contains links to other websites. This privacy policy only applies to our website so if you link to other websites you should read their own privacy policies.

### **What can you do if you are unhappy with how your personal data is processed?**

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **Changes to our privacy policy**

We keep our privacy policy under regular review and we will place any updates on our website at [www.as-financial.com](http://www.as-financial.com).