YOKE GLOBAL

Privacy Notice

For the financial advice firms we work with, and their advisers and staff

Version	26.11.09
In effect from	9 November 2026

This notice is for the financial advice firms we work with, and their advisers and staff. It explains how Yoke Global Limited uses and protects your personal data, including through Yoke Tech, and how we handle your clients' data on your behalf.

1. Who we are

Yoke Global Limited ("Yoke", "we", "us", "our") provides outsourced administration and paraplanning support to financial advice firms. We are registered in England and Wales with company number 08603405. Our registered office is 60 Queens Street, Stamford, PE9 1QS.

We are registered with the Information Commissioner's Office (ICO) under registration number ZA027876.

We are not authorised or regulated by the Financial Conduct Authority. We support your firm in meeting its own regulatory obligations.

Contact us about your data

Data protection contact	Michelle Wilson-Stimson
Email	michelle@yoke.global
Telephone	0203 519 9888
Post	Data Protection, Yoke Global Limited, 60 Queens Street, Stamford, PE9 1QS

2. Our two roles

We handle personal data in two capacities, and different rules apply to each.

Role	Whose data	What governs it
Controller	You, your advisers and staff, as our contacts, Yoke Tech users and billing contacts	This notice
Processor	Your clients and prospective clients, and their family members	Your instructions, and clause 15 and the Annex of our Client Terms of Business

The client data we process for you typically includes your clients' identity and contact details, family and financial circumstances, investments, pensions and protection policies, ID verification documents, correspondence and meeting notes, and, where relevant to the advice, health information. The full list is in the Annex of our Client Terms of Business.

Your clients' data. Your firm is the controller of your clients' data. Your own privacy notice to your clients should explain that you share their data with outsourced administration and paraplanning providers such as Yoke. If one of your clients contacts us about their data, we will pass the request to you and help you respond, as set out in clause 15.5(f) of our Client Terms of Business.

As your processor, we act only on your documented instructions, keep your clients' data secure and confidential, use only the sub-processors listed in section 5, tell you without undue delay about any personal data breach, and return or delete the data at your choice when our agreement ends, apart from the limited records described below.

You are responsible for having a lawful basis to share your clients' data with us, and for giving them any information the law requires (clause 15.4).

Records we keep to protect ourselves. We keep adviser instructions and the audit logs of cases for up to 15 years, so that we can respond to any later complaint, claim or regulatory enquiry about our work. For these records only, Yoke is the controller rather than your processor.

- **What we keep:** adviser instructions and case audit logs only. These may include your clients' names and case details.
- **Lawful basis:** our legitimate interests in establishing, exercising or defending legal claims. Where the records include health information, we also rely on the condition for legal claims in Article 9(2)(f) of the UK GDPR.
- **Who can access them:** only Yoke's directors and our Client Services Director, and only when a complaint, claim or regulatory enquiry needs them.
- **When we delete them:** within 15 years of the work, or earlier where we no longer need them. If a dispute is under way, we keep the relevant records until it is resolved.

Please make sure your own privacy notice names Yoke Global Limited as one of your service providers, explains that calls may be answered and recorded on your behalf, and explains that we keep adviser instructions and case audit logs for up to 15 years to deal with complaints or claims, as set out in clause 15.4 of our Client Terms of Business. Your clients can use their data protection rights over these records by contacting us (section 10).

3. What we collect, why, and our lawful basis

This section covers data for which we are the controller.

What we collect

- **Contact and business details:** name, job title, firm, work email, telephone number and business address.
- **Contract and billing records:** the agreements, Service Plan Confirmations and Case Proposals your firm has accepted, invoices, payments, and the firm's Direct Debit details collected through GoCardless.
- **Communications:** emails, calls and messages between you and us.
- **Firm fact find:** the contact details and preferences your firm records with us.
- **Yoke Tech account and activity data:** see section 4.
- **Call recordings:** recordings of telephone calls between your firm and us (see Call recording below).
- **Prospect details:** if your firm is not yet a client, your name, firm and business contact details, and notes of our conversations.

Most of this comes from you or your firm. Where your firm gives us your details (for example to set up your Yoke Tech account), your firm is the source. For prospects, details may also come from our website enquiry form, referrals, events, LinkedIn and other public websites.

We need your name and work email to set up a Yoke Tech account, and your firm's contact and billing details to provide our services and meet our tax obligations. Without them, we cannot give you portal access or provide the services.

Why we use it

Purpose	Lawful basis and our interest
Providing our services and managing our agreement with your firm	Legitimate interests: delivering the services your firm has agreed with us and running that relationship
Invoicing, collecting payment and keeping accounts	Legal obligation to keep tax and company records; legitimate interests in being paid for our work
Communicating with you about our services, your account and changes to our terms	Legitimate interests: keeping you informed about the services your firm receives
Sending news and marketing about our services	Limited companies and LLPs: legitimate interests in promoting our services. Sole traders and partnerships: your consent, or the "soft opt-in", which applies only where we collected your details during a sale or negotiations for one, we are marketing our own similar services, and you were given the chance to opt out then and in every message since
Recording calls between your firm and us	Legitimate interests in quality, training, keeping an accurate record of instructions and resolving queries and disputes

Purpose	Lawful basis and our interest
Giving you a Yoke Tech account and keeping it secure	Legitimate interests in protecting Yoke Tech and the confidential information in it; legal obligation to keep personal data secure
Evidencing the work we have done, and answering queries, complaints and audits	Legitimate interests in being able to account for our work; legal obligation
Following up enquiries from prospective clients	Legitimate interests in growing our business
Establishing, exercising or defending legal claims	Legitimate interests in protecting our legal position

Where we rely on legitimate interests, we have balanced them against your rights. You can object to this processing (section 10).

Marketing. You can object to marketing at any time, without giving a reason, by using the unsubscribe link in any email or by contacting us, and we will stop. Where we rely on your consent, you can withdraw it at any time.

Call recording. We record all calls to and from Yoke, including calls we answer in your firm's name. Every caller hears a recording message before we answer.

- **Calls between your firm and us:** Yoke is the controller of these recordings, for the purposes and on the lawful basis in the table above.
- **Calls we answer in your firm's name, including from your clients:** recording these calls is part of the service your firm buys from us. We record them on your instructions, as your processor (section 2), and will give you a copy of any recording on request.

Only Yoke's directors and our Client Services Director can access recordings. How long we keep them is set out in section 7. If a recording is needed for a complaint or dispute, we keep it until the matter is resolved.

We do not use your data for automated decision-making or profiling that has legal or similarly significant effects. We do not sell personal data.

4. Yoke Tech

Yoke Tech is our operating platform, including the adviser portal. If you have a Yoke Tech account, we are the controller of the following data about you:

- **Account details:** name, work email, job title, firm or team, and your role and permissions.
- **Sign-in and security data:** a one-way hash of your password (never the password itself), one-time codes and their expiry, failed sign-in attempts, whether your account is locked, and the date, time and IP address of your sign-ins.
- **Change history:** a record of changes made to records in Yoke Tech: what changed, from what to what, when, and which account made the change.

- **Content you create:** notes, comments, feedback, accepted Case Proposals and documents you upload, each attributed to you.
- **Preferences:** saved display settings, such as dashboard layout and table filters.

We use this data to run your account, keep Yoke Tech and its data secure, investigate problems, and evidence the work we have done for your firm. The lawful bases are set out in section 3.

Cookies. Yoke Tech uses only cookies that are strictly necessary for it to work. See the Yoke Tech Cookie Notice for details. Yoke Tech loads its typeface from Google Fonts, so your browser sends your IP address and browser details to a Google server when a page loads. No other information is sent.

Documents and notes about your clients held in Yoke Tech are processed on your behalf, as described in section 2.

5. Who we share data with

We share personal data only where we need to, and never for anyone else's marketing.

Sub-processors. These suppliers process your clients' data on our behalf. Each is under a written contract with data protection terms equivalent to ours. We will tell you about any change under clause 15.6 of our Client Terms of Business, normally giving at least 14 days' notice, and you may object to a new or replacement sub-processor as set out in that clause.

Sub-processor	What they do	Where data is processed
Heroku (Salesforce)	Yoke Tech application and database hosting	Ireland (Dublin)
Amazon Web Services	Yoke Tech document storage	UK (London)
Microsoft	Email, Teams and document storage (Microsoft 365)	UK
Argon	External IT support and security	UK
Acronis (through Argon)	Backup of our Microsoft 365 email and documents	UK
Numbergroup	Telephone system, including answering and recording calls in your firm's name	UK
SMTP2GO	Yoke Tech emails, such as invitations and one-time codes	UK
Britim	Collection and shredding of confidential paper	UK
Selectapension	Pension switching research, using our own licence	UK
Sentry	Yoke Tech error monitoring	EU

Systems your firm controls. When we work in systems your firm licenses and controls, such as your CRM, back office, research or cash flow planning tools, we do so on your behalf under your firm's own contract with that provider. Those providers are not our sub-processors.

Other suppliers. We also use suppliers to run our own business. They hold data about your firm and its people, and are not used to process your clients' data, although limited details, such as a client's name on an invoice for a case, may appear in our business records. They include accounting and Direct Debit collection (Xero and GoCardless), email and newsletter tools, and design tools. Where any of them processes data outside the UK, the safeguards in section 6 apply.

Others. We may also share data with:

- your own firm, where the data is about your use of Yoke Tech on its behalf;
- our professional advisers, auditors and insurers, where they need it;
- HMRC, a regulator, a court or a law enforcement body, where the law requires or permits it.

This list was last updated on 9 November 2026.

6. Where data is held

Yoke Tech documents are stored in the UK (AWS London region), and the Yoke Tech application and database are hosted by Heroku in Dublin, Ireland. Ireland is in the European Economic Area, which the UK recognises as providing adequate protection for personal data. Our team works from the UK, and we do not use offshore teams.

If a supplier processes personal data outside the UK, we make sure a safeguard recognised under UK data protection law is in place. That is either a UK adequacy decision for the destination country, or the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, with any additional safeguards the transfer needs. This includes any support or maintenance access from outside the UK. The locations for each supplier are listed in section 5. You can ask us for a copy of the relevant safeguards by contacting us (section 1). We may remove commercially sensitive details.

7. How long we keep it

Data	How long	Why
Your clients' data	Until our agreement with you ends or you ask us to delete it. When the agreement ends, we ask whether you want it returned or deleted. If we do not hear from you within 30 days, we delete it after your portal access ends. This applies to all copies, including emails and call recordings, apart from the records in the next row	To provide the Services

Data	How long	Why
Adviser instructions and case audit logs	Up to 15 years from the date of the work. We review these records regularly and delete them earlier where they are no longer needed	To respond to complaints or claims about our work. 15 years matches the long-stop limitation period for negligence claims
Contracts, invoices and payment records	6 years from the end of the financial year they relate to	Tax and company law requirements
Correspondence with your firm	6 years after our agreement ends	The usual period in which a contract claim can be brought
Call recordings	2 years	Quality, training and resolving queries and disputes
Yoke Tech user accounts	While the account is active. When it closes, we lock it, and remove your contact details 6 years later. Your name stays in case audit logs for as long as those are kept	To keep an accurate record of who did what
Sign-in records and IP addresses	24 months	Security monitoring and investigating suspicious activity
One-time sign-in codes	Valid for 5 minutes. Deleted as soon as they are used, and expired codes are deleted daily	Sign-in security
Prospect details	2 years after our last contact, unless your firm becomes a client	To follow up enquiries
Unsubscribe records	As long as needed to make sure we do not email you again	To respect your marketing choices

If a complaint, claim, regulatory enquiry or legal requirement means we need a record for longer, we keep the relevant record until the matter is resolved. We review our retention periods regularly.

A firm's portal access is removed 60 days after its agreement with us ends. When data is no longer needed, we securely delete or anonymise it.

8. Security

Yoke Tech is built and maintained in-house by our own developer, who is a Yoke employee, and is hosted by Heroku. We use technical and organisational measures to protect personal data from unauthorised access, loss or misuse:

- **Encryption:** Yoke Tech documents are stored encrypted in the UK (London). Text data is encrypted, and all traffic is encrypted in transit.
- **Sign-in:** every Yoke Tech account uses a password and a one-time code. Passwords are stored only as a one-way hash. One-time codes are valid for 5 minutes and stored only in encrypted, hashed form. Five failed sign-in attempts lock the account for 15 minutes.
- **Access controls:** access is restricted by role. A firm's users can see only their own firm's records.
- **Backups:** the Yoke Tech database is backed up daily. We keep daily backups for 7 days and weekly backups for 4 weeks. Documents are protected by versioning so they can be recovered. Our Microsoft 365 email and documents are also backed up separately by Argon.
- **IT security:** our external IT provider, Argon, keeps our systems and networks secure and up to date. Microsoft 365 can only be accessed from company devices we manage, from within the UK, using multi-factor authentication. We hold Cyber Essentials certification, renewed annually.
- **Training:** everyone in our team receives data protection and information security training, covering UK GDPR, phishing and cyber risk, confidentiality and secure data handling. Refresher training is given every year.

If you believe you have found a security vulnerability in Yoke Tech, please tell us at operations@yoke.global rather than disclosing it publicly.

9. Data breaches

Your clients' data. If a personal data breach affects your clients' data, we will tell you without undue delay and help you meet your own obligations, including any report to the ICO or to the people affected.

Data we control. If a breach affects data for which we are the controller, we will report it to the ICO within 72 hours of becoming aware of it where it is likely to put people's rights and freedoms at risk. If it is likely to result in a high risk to you, we will also tell you without undue delay.

10. Your rights and complaints

For data we hold about you as a controller, you have the right to:

- ask for a copy of it;
- have inaccurate data corrected;
- ask us to delete it, where we no longer have a good reason to keep it;
- ask us to restrict how we use it while a concern is resolved;
- object to our use of it where we rely on legitimate interests;
- object to direct marketing at any time, in which case we will stop;
- withdraw your consent at any time, where we rely on consent;
- receive it in a portable form, where the law allows.

We assess each request on its own merits. Because Yoke Tech keeps an accurate record of who did what, we may keep an original entry alongside a correction rather than overwrite it. Where we cannot do what you ask, we will explain why.

To use any of these rights, contact Michelle Wilson-Stimson at michelle@yoke.global. Requests are normally free, and we answer them without undue delay and normally within one month. We may extend this time, or charge a reasonable fee, only where the law allows, and we will tell you if we do.

Complaints. If you are unhappy with how we have handled your data, please tell us so we can put it right. We will acknowledge your complaint within 30 days, investigate it, keep you informed and tell you the outcome without undue delay. You can also complain to the ICO at any time. You do not have to contact us first:

- Website: ico.org.uk/make-a-complaint
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11. Changes to this notice

We update this notice when our practices or suppliers change. Each update gets a new version number and date, shown at the top. When we add or replace a sub-processor, we also tell our client firms by email under clause 15.6 of our Client Terms of Business.

The current version is always available on our website and in Yoke Tech. New Yoke Tech users are shown it when they first sign in, and we email users when we make significant changes.