

**Overview:** We will ask you to provide us with detailed information so that we can deliver our services to you. We will refer to this information as “Your Data” throughout this privacy notice. We will ask for details about you and your family, your employment, your financial information, your state of health and your financial goals. This privacy notice is important as it explains what we will need to do with this data, and the various rights you have in relation to the data.

**Legal position:** The collection of data is necessary for us to perform the contract for services we agree with you. Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use your data provided it is in our legitimate business interest to do so and your rights are not affected. E.g. We may need to respond to requests from providers and our external compliance support relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received. On occasion, we will use your data for responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing your data to meet a legal, compliance or other regulatory obligation to which we are subject.

**Collecting and storing data:** In accepting our terms of service, you consent that we may process your data for the purposes of providing our Services. This includes obtaining, recording and holding information about you, your family and your business and personal affairs; we obtain that information directly from you, and from third parties who you authorise to provide information. You provide this information in your meetings with us, (and by letter, emails and phone calls.) We record this information on our paper files and our computer databases (including mobile and cloud devices.) You may also provide us with copies of documents about your financial affairs which we retain. We also collect information from third parties about you, in paper and computer forms. E.g. information from providers about your existing investments, or information from your accountant about your financial position.

**How the data is used:** Primarily, we use your data and data about your family’s circumstances to provide advice to you, complete transactions on your behalf, and then maintain our relationship with you. If you limit the information you provide to us, or decline to answer certain questions, then we may not be able to provide our services to you, or our services may be limited by the lack of information.

**Data sharing:** We may share Your Data with other companies and agencies associated with us. When we undertake our research, or when we arrange a product for you, we will pass some of your information to the chosen bank, lender, insurance company, pension provider, or platform service. These companies ask for your information in the form of an application document (which could be electronic). They may ask for other supporting data relevant to your transaction and copies of your identification documents.

Companies and agencies we share your data with could be: (1) product providers - as explained above; (2) the FCA, FOS or any other statutory, governmental or regulatory body – if they request to see our files or you make a complaint; (3) solicitors and debt collection agencies – if we are involved in a dispute with you; (4) third-party suppliers who provide services to us for quality control purposes and administration. (E.g. business processing services, client database systems, report writing services, or compliance and regulatory advice services.)

You agree that relevant personal information held by us may be disclosed on a confidential basis, and in accordance with regulations, to any such parties. The sharing of your data does not entitle such third parties to send you marketing or promotional messages.

We do not envisage that the performance by us of our service will involve your data being transferred outside of the European Economic Area. There may be a product provider/ investment manager who may administer your policies

and provide some of their services from centres outside Europe; these countries may not always have the same standard of Data Protection laws as the UK and EU. However, the providers of these services are required to put a contract in place to ensure that your information is adequately protected, and they will remain bound by their obligations under the General Data Protection Rules even when your personal information is processed outside Europe.

We would always ask for your permission to pass your data to other professional advisers to provide advice most suited to your circumstances. E.g. local accountants, solicitors, tax advisers. With your permission we may sometimes pass your information to specialist advisers in the financial and insurance industry where we do not feel we have appropriate expertise.

**Special category (“sensitive”) data:** The information you provide may also contain “special personal data.” This is defined as information about your health (or that of your family), any information related to your ethnic origin, criminal offence data, political opinions, religious or philosophical beliefs, sexual orientation, or your membership of a Trade Union. E.g. (1) Life insurance applications ask for data about health, medical history and ethnic origin; (2) you may share your religious beliefs with us whilst discussing ethical investment; (3) you may share your political opinions whilst discussing the effect of governmental policy on the economy and markets.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information that relates to those children and potentially, to their special data.

We will use special category data in the same way as your data generally, as set out in this Privacy Notice. You provide your explicit consent to collect special category data.

**Your obligations:** We expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted, and only using secure methods of postage when critical documentation is being sent to us.

**Retention of data and destruction of data:** We will retain your data for the purposes of providing our services, and for any contracted ongoing service, and for future administration. We will also retain your data according to the statutory requirements. If you wish us or any company associated with us to cease processing your personal data or special personal data, please contact the compliance officer at our office address.

**Security of data:** Safeguards are in place to ensure that the information we hold is accurate, kept up to date and not kept for longer than is necessary. Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss, destruction, or damage to the data. You may be assured that we and any company associated with us will treat all data and special category data as confidential and will not process it other than for legitimate purposes we have described.

**Your rights:** You can request copies of your data that is under our control. You can ask us to further explain how we use this data. You can ask us to correct, delete or require us to restrict or stop using the data; (Details as to the extent to which we can do this will be provided at the time of any such request.) You can change the basis of the consent you have provided.

We are a registered data controller with the Information Commissioner, and we comply with the provisions of the Data Protection Act. You have a right to complain to the Information Commissioners Office if you believe there is a problem with the way we handle your data. The ICO can be contacted on 0303 123 1113 or [ico.org.uk/](http://ico.org.uk/)

**Marketing:** We will ask you if you are willing to receive marketing information from us. We will ask your preferences for the methods by which we can contact you for marketing purposes. If you provide us with this consent then we may contact you (or pass your details to other companies associated with us) with details of any other similar products, promotions, or for other related marketing purposes. You can withdraw this permission at any time by contacting us.