

Full Privacy Notice

Introduction

We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information.

Your Privacy Rights

You have the right to see what personal information we hold about you and you can ask us to correct inaccuracies, delete or restrict personal information or ask for some of your personal information to be provided to someone else. You have the right to object to how we use your personal information. If you need to contact us in relation to any of your rights or wish to make a complaint about how we have used your personal information directly to us or to the Information Commissioner's Office, you can use the contact details indicated on the first page of this notice.

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Access to your personal information:** You can request access to a copy of your personal information. We will not normally charge for providing this information to you.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information for marketing purposes.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

Legal basis for collecting/processing information

The legal basis on which most of the information that you provide will be collected and processed is to enable us to provide the financial advice that we have agreed you require.

However, some types of information require your explicit consent. In particular, where we identify that it is relevant to obtain details from you in relation to any adverse health history you might have, we will seek your explicit consent.

Where you have given us consent, you have the right to withdraw it at any time.

What kinds of personal information we use

We use information relating to your personal situation and financial position.

How we gather your personal information

We obtain personal information:

- directly from you, usually in a face to face meeting but potentially also by telephone or other means;
- from other organisations such as investment/pension/insurance providers, where you have provided authority for them to share information relating to your existing plans;
- from your professional advisers, where you have provided authority for them to share information.
- We may also obtain some personal information from recording calls or meetings or by making contemporaneous notes of calls or meetings.

How we use your personal information

We hold your personal information as Data Controllers in accordance with the requirements of the Data Protection Act 2018 and the EU General Data Protection Regulation, together referred to as the 'Regulations'.

We use this information to analyse your current and future financial needs so that we can ensure that any subsequent advice takes due account of, and is suitable to, your circumstances.

We will not share your information with any other party except as indicated in this Privacy Statement or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

Sharing and transferring personal information

Where necessary to the provision of our service, we may share your personal information with third parties. The categories of third party are listed below.

- Insurance Providers
- Pension Providers
- Annuity providers
- Investment Providers
- Investment Platforms
- Providers of pension transfer comparison reports
- Compliance Advisers
- Legal Advisers
- Intelligent Office
- Superbia Shared Services

We will confirm the actual third parties with whom we will share your information when we have identified the product/service providers that we recommend you use. This will usually be done in our suitability report in which we will detail our recommendations to you.

Until you have been informed of the actual third parties with whom we will share your information, and provided that you have not terminated our contract or otherwise objected to that sharing, we will only share in a way that does not enable the third party to identify you.

Where necessary to implement the service that you require, your personal information might be transferred to other countries outside the UK, but only to jurisdictions where suitable protection is in place.

Keeping personal information

We keep your personal information securely for as long as we need to for the purpose of providing you with financial advice under the terms of our service/fee agreement (contract) or for as long as we are required to by relevant regulations.