



## **PROTECTING YOUR PERSONAL INFORMATION - PRIVACY NOTICE**

This privacy notice explains how we use any personal information we collect about you.

### **WHAT INFORMATION DO WE COLLECT ABOUT YOU?**

We collect information about you when you engage with us for the services provided by our firm, financial planning and general insurance. This information will relate to your personal, business 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 voluntarily complete client surveys or provide feedback to us. Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site. If you wish you can set your browser not to accept cookies from us. Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

### **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'd also be unable to fulfil our legal and regulatory obligations. **Special categories of personal data:** there are certain categories of personal data that are sensitive by nature. The categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health. Depending on the nature of the products and services that you engage us for we may need to obtain your sensitive personal data particularly in relation to health. Our policy is that should we require any special category of personal data we will only gather this with your explicit consent.

### **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?**

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 and platform 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, for example password protection and encryption. 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. We will not share your information with any third party for their marketing purposes.

#### **HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?**

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us. 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'd like a copy of some or all of your personal information please email or write to us using the contact details noted below. When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use. 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.

#### **MARKETING**

We would like to send you information about our products and services which may be of interest to you. If you have agreed to receive marketing information, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

#### **WHAT CAN YOU DO IF YOU ARE UNHAPPY WITH HOW YOUR PERSONAL DATA IS PROCESSED?**

You can write to us at Woodward Markwell, Friars House, 2 Falcon Street, Ipswich, Suffolk, IP1 1SL. 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. 0303 123 1113.

#### **FURTHER CHANGES TO OUR PRIVACY POLICY**

We keep our privacy policy under regular review, this privacy policy was last updated on 1st May 2018.

#### **HOW TO CONTACT US**

Please contact us at the above address if you have any questions about our privacy policy or information we hold about you.