

Customer Privacy Notice

Why should you read this document?

In dealing with us, we will ask for detailed personal information relating to your current circumstances, financial situation, health and family health history (**Your Personal Data**). This document is important as it allows us to explain what we need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

What do we mean by “Your Personal Data”?

Your Personal Data means any information that describes or relates to your personal circumstances, directly such as your name, address, date of birth, National Insurance number and indirectly, such as your employment status, physical and mental health history, or any other information that could be associated with your cultural or social identity.

In providing you with investment mortgage and insurance advice your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically about the processing we may undertake in relation to this type of information)
- Any existing investment, mortgage and insurance products and the terms and conditions relating to these

How we deal with Your Personal Data

Whenever we discuss your investment, mortgage and insurance requirements, we are, as client and firm, entering a contract for the supply of services. To perform that contract, and arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

During our discussions and when the contract between us has terminated we have the right to use Your Personal Data if it is in our legitimate business interest to do so; your rights are not affected. For example, we may need to respond to requests from mortgage lenders, insurance providers and our Compliance Service Provider relating to our advice. We may also need to contact you to seek feedback on the service you received.

We will use and process Your Personal data for contractual responsibilities to our regulator, The Financial Conduct Authority, as well as our compliance, legal or regulatory obligations to which we may be subject to.

How we will process certain parts of Your Personal Data

We may ask you for Your Special Data to assist you with insurance and ethical investments which will include your ethnic origin, health and medical history.

We will record and use Your Special Data to make enquiries with providers in relation to products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences. **Criminal Disclosures** are relevant to insurance related activities such as underwriting, claims and fraud management.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Data and Criminal Disclosures must be capable of being exchanged freely between our Firm and insurance providers.

How do we collect Your Personal Data?

We will collect and record Your Personal Data directly from you. This can be provided verbally in meetings and in writing including emails so we can establish your circumstances and needs and preferences.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Personal Data for example software that can verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

What happens to Your Personal Data when it is disclosed to us?

While handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit Your Personal Data to Product Providers/Mortgage Lenders/Commercial Lenders and/or Insurance Product providers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment/mortgage/finance product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Investment Providers/Mortgage lenders/Finance lenders and insurance providers.
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our Compliance Advisers, Product specialists, estate agents, providers of legal services such as estate planners, conveyancing, surveyors and valuers (in each case where we believe this to be required due to your circumstances).

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your investment/mortgage/finance and/or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also 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 original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

Your rights in relation to Your Personal Data

You can:

- request copies of Your Personal Data that is under our control
- ask us to further explain how we use Your Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

If you have any questions or comments about this document, or wish to exercise any of your rights set out within it please contact us.

We may have a legal right to deal or action your request in a different way. If so, we will inform you of this at the time.

You should also contact us as soon as possible if you become aware of any unauthorised disclosure of Your Personal Data, so we can investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you can lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Data Subject Consent Form

I hereby grant **GMP Independent Financial Advisers LLP** permission to process my personal data for the purpose stated in the Privacy statement above.

Signature:

Print Name:

Date:

Marketing Consent

I, hereby grant **GMP Independent Financial Advisers LLP** permission to process my personal data for Marketing purposes. By providing your consent, you agree that you have given your express permission for us to market you regarding products and services that we think may be of interest to you and by any means of communication that is suitable at the time.

IMPORTANT NOTES: Marketing by our Firm

If you do not indicate your agreement for **us** to contact you, we may be unable to provide you with details of products and/or services that may suit your needs and circumstances.

We would like to maintain a record of your express consent for **us** to contact you by post, telephone, SMS, email and instant messaging for marketing our products or services that we think may be of interest to you. Please indicate your consent to **us** contacting you by any of the means specified below:

Post Phone SMS Email Instant Messaging (WhatsApp or similar service).

Signature:

Print Name:

Date: