

PRIVACY POLICY

Introduction

This notice provides you with information concerning our collection and use of personal data. If you have any queries regarding this statement, please do not hesitate to contact us.

Legal basis

We collect, control and process your personal information because this is necessary to provide you with information, answer any queries you may have and for the provision of our services to you. Contractual necessity is therefore the lawful basis for collecting, controlling and processing your personal details and those of your employees and service providers other than sensitive personal data for which we require individual consent.

Sensitive personal data:

- *Racial or ethnic origin*
- *Political opinions*
- *Religious or philosophical beliefs*
- *Trade union membership*
- *Genetic data*
- *Biometric data*
- *Data concerning health*
- *Data concerning sex life or sexual orientation*

We would discuss with you the need for the provision of sensitive data before you provide this information. The subsequent provision of sensitive personal data will be taken as consent to this processing.

It is entirely up to you as to whether or not you choose to provide us with any personal information. If you choose not to, we simply may not be able to assist you.

We do not use your personal data for marketing purposes nor will we share your data with any other organisation for marketing purposes.

What data we collect & what do we do with it

Once we have responded to your enquiry your data will be stored within our systems, on local computer drives at our offices and shared with our mobile devices via cloud services.

Working with us

We collect and use information about you, which will include personal data in order for us to advise you and make arrangements for you. Your name and email and information relating to the work we undertake for you will be processed and stored.

Sharing your data

In order to fulfill our obligations under any contract for services we will need to share your data with third party Data Controllers and Data Processors.

Data Controllers

This will include

- Product & service providers in relation to investments, plans and pensions.
- Our compliance monitoring services.

- The Financial Conduct Authority.
- The Financial Ombudsman Service.
- Any other regulators where so required.
- Para-planning (investment research) services.

We also use external Data Processors that will hold information for the following purposes:

- Research
- Secure file sharing
- Data backup
- Communications
- Accounts
- Forecasting
- Record keeping
- Regulatory compliance

All external processors are only permitted to process your data in line with our instructions.

Data processors privacy

Below is a list of the processors used and the types of information processed. Please note that the Privacy & Security policies of the processors are aimed at the controllers who use them and may be updated.

Processor	Type of processing & data
Apple	We use Apple's iCloud to synchronise calendar & contact details with smart phones to facilitate efficient communications. The information shared comprises contact information: name, phone numbers, email, address, meeting dates.
Dropbox	We use Dropbox to securely share files and documents that contain or may contain personal data pertinent to the work we undertake for clients and for our staff.
Genovo	We use Genovo software to generate reports and your personal data pertaining to our advice is entered during this process and stored.
Microsoft	Microsoft Office 365 is used for email, file storage, sharing, word processing, letter & report writing and communications generally.
Morningstar	Morningstar is used for portfolio reporting and investment research, limited personal data is processed for identification purposes.
CashCalc	Cash calc is use for cash flow modeling and forecasting.
Iress	Iress assureweb is used to obtain comparative protection insurance quotations, relevant data concerning age and insurance requirements.
Mortgage Brain	Mortgage sourcing software processes relevant personal data pertaining to age, income and mortgage requirements.
Defacto	Product provider research - limited personal data is processed for identification purposes.

In all cases we seek to minimize the amount of personal data shared and, in some cases, anonymise this. It is essential, however, that we can identify you quickly and easily, so information shared may be identifiable as your personal data.

We will not share your personal information in any other circumstances than those necessary for the provision of service to you or where we are required to do so by law.

Where we store your Personal Data

All the data that we collect is stored on our local secure server or encrypted back-up drives & lap tops in the UK or with our listed processors under contract.

Marketing

The information we collect about you is used solely for the purposes for which it was provided. We will never use your data or share it for marketing purposes.

Your rights

Under data protection law you have the right to ask us for a copy of the information we hold about you, and to have any inaccuracies corrected or removed. You may also ask us to delete or cease processing all personal data held by us or any processor with which we have shared your data. We may not always be able to comply with a request for deletion, but you can ask us to cease processing your data.

In addition you have the right to be informed about the data we collect, where is located and with whom it is shared and the processing we undertake and to question any automated decision making processes

To do this, or if you require more information please either contact us in writing, by telephone or email.

Complaints

We are registered as a Data Controller in the UK with the Information Commissioner's Office. Click [here](#) for more information.

Contact

For any queries about data protection please contact:

Contact name	Ian Runcie
Address	Suite 5, Stubbings Estate, Henley Road, Maidenhead SL6 6QL
Telephone	01628 826254

IP Addresses and Cookies

Our website does not use cookies.

Any changes we may make to our privacy policy in the future will be posted on our websites where appropriate or may be notified to you by post or e-mail.