

## Customer Privacy Notice

### Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (Your Personal Data). This document is important as it allows us to explain to you what we will 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. Your Personal Data may identify you directly, for example your name, address, date of birth, national insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your Investment, Mortgage, and/or Insurance requirements Your Personal Data may include:

- Title, name, 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 dependants
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information).
- Any pre-existing investment, mortgage, and/or insurance products and the terms and conditions relating to these.

If you are providing information about another person, we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this Privacy Notice and if they have any concerns please contact us in one of the ways described below.

### The basis upon which our firm will deal with Your Personal Data

When we speak with you about your requirements we do so on the basis that both parties are entering a contract for the supply of services. In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

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 Personal Data, provided it is in our legitimate business interest to do so and 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 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 Personal Data for contractual 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 Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

### The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with for example, life insurance and insurance that may assist you in the event of an accident or illness, we may ask you information about your ethnic origin, your health and medical history (Your Special Data). We may record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance 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, it is also very likely that 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 (together "Criminal Disclosures"). This is 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 Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

### How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to investment, mortgages, and insurance. You may provide information to us verbally and in writing, including email.

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 is able to verify your credit status, we will only do so 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?

When 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, 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 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 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 particular circumstances).

In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice. 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 rights to such information we will retain records indefinitely.

### Overseas Transfers

We don't transfer personal data overseas except where we do so as a result of client activities, for example, where we use third party cloud-based services, email services, or when asked to do so by you. When personal data is transferred, we ensure that appropriate legal and technical safeguards are in place.

### Your rights in relation to Your Personal Data

Where we hold personal data about you we take reasonable steps to ensure it is complete, accurate and up to date. You have the right to object to processing, to amend an inaccuracy, request access to the data we hold on you, restrict how we use personal data about you or to have data about you deleted from our files, subject to our regulatory and legal obligations and interests, or transferred to another organisation. You can also 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. You can ask for further details in relation to how we use your personal data and being transferred outside the UK and EEA.

### How to make contact with our Firm in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact: Phillip Hasell, Headley Financial Services, William Curtis House, 25 Lenten Street, Alton GU34 1HG, call 01420 446 140 or email [phil.hasell@headleyfs.com](mailto:phil.hasell@headleyfs.com)

If we feel we have a legal right not to deal with your request, or to action it in a different way to how you have requested, we will inform you of this at the time.

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

If you have any concerns or complaints as to how we have handled Your Personal Data you may 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.