

## Privacy Notice

During our relationship, we will ask you to provide detailed personal information about you and your family. This privacy notice explains how we collect and use the personal information we collect.

### What information do we collect about you?

We collect information about you when you engage us for financial planning, advice and/or investment management services. This information will relate to your personal and financial circumstances and may include, but is not restricted to: basic details; employment; remuneration; tax; liabilities and protection products.

It may also include special categories of personal data such as information about your health or philosophical views and any previous criminal offences, if this is necessary for the provision of our services. We require additional consent to hold this data, which is requested at the end of this document.

We may also collect information when you voluntarily complete client surveys or provide feedback to us and through cookies on our website.

### Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We can provide a copy of this privacy notice to them or, where appropriate, ask you to pass the privacy information to them.

### 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 would also be unable to fulfil our legal and regulatory obligations.

### 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, credit check, professional research, 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 will only act in accordance with our written instructions.

Where it is 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. These can consist of password protecting documents and using secure online portals.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime, we will send your details to third party agencies for identity verification purposes.

### How long do we keep hold of your information?

During the course of our relationship with you, we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship.

We are also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business
- Indefinitely for pension transfers and opt-outs
- Three years for insurance business

These are minimum periods, during which we have a legal obligation to retain your records. We reserve the right to retain data for longer, or indefinitely where we believe it is in our legitimate interests to do so.

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 would like a copy of some or all of your personal information please email or write to us using the contact details noted at the end of this document.

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.

### What can you do if you are unhappy with how your personal data is processed?

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

### How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you by emailing our Compliance Officer Phil Hasell on [phil.hasell@headleyfs.com](mailto:phil.hasell@headleyfs.com) or write to us at William Curtis House, 25 Lenten Street, Alton, GU34 1HG.