

## Privacy Notice

Swakeleys Associates Ltd is committed to protecting your personal information and your privacy.

At all times we will act in accordance with the requirements of the Data Protection Act 2018 and the EU General Data Protection Regulation, as amended, extended, re-enacted or consolidated from time to time.

This Privacy Notice tells you how we will handle your personal information when you make contact with us, or you or your financial advisers use one of our services.

We'll tell you:

- **The type of information we process;**
- **How we get the personal information and the reasons we have it;**
- **How we store personal information;**
- **How we may Sharing personal information;**
- **Your rights;**
- **How to complain**

We keep our data protection arrangements under regular review. This notice was last updated on 28/02/2023.

Swakeleys Associates Ltd is the controller for the personal information we process.

You can contact us, including by phone, email and post.

Telephone: 01895 464012      E-mail: r2010jones@hotmail.co.uk

Post: 149 Swakeleys Road, Ickenham, UB10 8DL

### **The type of information we process**

In order to provide our services and verify your identity, we need to collect and process the following information:

- Personal identifiers, contact information and characteristics (for example name and contact details, National Insurance number and date of birth);
- Personal and financial information;
- 'Special Category data' information, examples of which might include details of your health, sexuality or religious beliefs.

Information relating to usage of our website may be collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information.

### **How we get the personal information and the reasons we have it;**

Most of the information we process is provided directly by you to help us to provide you with financial advice and services.

We use the information given to us in order to verify your identity and research the best solutions for your financial needs, and arrange relevant contracts on your behalf.

We are required to have a 'lawful basis' in order to process your data.

- i. The primary legal basis for processing data is for the performance of our contract with you, i.e. it is necessary in order for us to be able to deliver the services.
- ii. Where you provide us with "Special Category Data" (including race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation), we must obtain explicit consent from you for processing this data. This consent must be for a specific purpose and may be withdrawn by you at any time.
- iii. Consent would also be required in order to process your data for marketing purposes.
- iv. There may be data processed by us in order to meet a legal obligation. This would include Anti-money laundering checks for example.
- v. We may also process data where we have a 'legitimate interest', for example in the pursuance of debt.

### **How we store your personal information**

We take the security of personal data extremely seriously. Your information is securely stored on our computer systems. Any paper records will be held securely and shredded at the earliest opportunity. We have arrangements in place to ensure that personal &/or confidential information is protected so as to minimise the threat of loss or damage.

We will keep your records indefinitely as this enables us to provide any ongoing services and handle any future claims or complaints. It may also be required to meet legal or regulatory obligations.

Where you request us to delete any personal data, we will comply with requests subject to the restrictions of any regulatory obligations and legitimate interests as noted above.

### **Sharing your personal information**

We will not share personal data with any third parties for the purposes of direct marketing.

We may share information with electronic verification providers, product providers or other financial providers such as lenders, banks, insurers, fund managers and platform providers.

We may use data processors who are third parties who provide elements of service for us. We have contracts in place with such data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from Swakeleys Associates Ltd. They will hold this securely and retain it for the period we instruct.

We may be required to pass on your personal information to the Financial Conduct Authority (FCA), Financial Ombudsman Service (FOS), the Financial Services Compensation Scheme (FSCS) or the Information Commissioner's Office (ICO) to help with an investigation or complaint; or to other authorities as required by the law.

Our websites, reports, newsletters and other services may contain links to websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

### **Your rights**

Under data protection law, you have a number of rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Swakeleys Associates Ltd if you wish to make a request.

Telephone: [phone number]    E-mail: [email address]

Post: [postal address]

#### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us by:

Telephone: 01895 464012    E-mail: r2010jones@hotmail.co.uk

Post: 149 Swakeleys Road, Ickenham, UB10 8DL

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

It is important that you understand your rights and our responsibilities. If you have any questions at all about this notice or would like any points clarifying, please contact us on 01895 464012