

6. Privacy Notice

As the Data Controller, 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 section is important as it allows us to explain what we will need to do with your personal data and the various rights you have in relation to this.

6.1 WHAT DO YOU MEAN BY “YOUR PERSONAL DATA”

Your personal data means any information that describes or relates to your personal circumstances. It may identify you directly, for example your name, address, date of birth, national insurance number. It 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 our services, this may include:

- a. Title, name, date of birth, gender, nationality, civil/marital status, contact details, addresses that are necessary to verify your identity.
- b. Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history.
- c. Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependants.
- d. 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).
- e. Your other pre-existing financial products and the terms and conditions relating to these.

Where applicable we also collect information about your dependants, spouse, beneficiaries or next of kin. Before providing this information to us you should have their agreement as per these terms and conditions.

6.2 THE BASIS UPON WHICH OUR FIRM WILL DEAL WITH YOUR PERSONAL DATA

When we speak with you about your circumstances, requirements or similar 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 within this Privacy Notice.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end, 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 the provider/s 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.

6.3 THE BASIS UPON WHICH WE WILL PROCESS CERTAIN PARTS OF YOUR PERSONAL DATA

In some circumstances we will ask you information about your ethnic origin, your health and medical history (special category data). We will record and use your special data in order to make enquiries in relation to products that may meet your needs and to provide you with advice/guidance 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 this information on our system and potentially their special category 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 category 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 Pareto Financial Planning Limited and the insurance providers. This will enable you to secure the important insurance protection that you require.

6.4 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 the course of our initial meetings or conversations with you to establish your circumstances and needs. You will 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 electoral register. Should we need to use software to collect personal data such as verification of your credit status, we will require your consent for us or our nominated processor to do so. With regards to electronic ID checks we would not specifically require your consent for this.

6.5 SHARING YOUR PERSONAL DATA

From time to time your personal data will be shared with:

- a. Product providers
- b. 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 and product providers (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 our Privacy Notice 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 our Privacy Notice.

We do not envisage that the performance by us of our service will involve your personal data being transferred outside of the European Economic Area (EEA). Should this be the case however, we will ensure that it is protected to the same extent as in the UK and the EEA.

6.6 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 a legal right to such information, we will retain records indefinitely.

6.7 YOUR RIGHTS

You can:

- a. Access your personal information - find out what personal information we hold about you
- b. Ask us to further explain how we use your personal data
- c. Ask us to correct, delete or require us to restrict 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. You can ask us to stop using your information until your query re accuracy or use is resolved).
- d. Ask us to send an electronic copy of your personal data to you or another organisation should you wish.

- e. Object to any processing of your data done under legitimate interests – this will depend on particular circumstances (will be assessed on a case-by-case basis).
- f. object to our use of your information for direct marketing purposes - we will always act upon your request.
- g. Ask us to delete your personal data in some circumstances, e.g. if we stopped providing you with our services and do not need to keep your information for legal or regulatory reasons. If we are using consent to process your information and you withdraw it, you can ask us to erase your information on case-by-case basis.
- h. 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).

6.8 HOW TO CONTACT US

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:

IN WRITING:

The Data Protection Officer

Pareto Financial Planning Limited
Level 7, Tower 12, The Avenue North,
18-22 Bridge Street, Spinningfields, M3 3BZ

Telephone: 0161 819 1311

Email: DataProtection@paretofp.co.uk

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 make contact with 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 Information Commissioner's Office (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.

We will respond to any complaints within 30 days of receiving written notice.