

PRIVACY NOTICE

Privacy Notice

Pareto Financial Planning Limited is a company incorporated in England & Wales, company number 06582775 with registered office at Level 7, Tower 12, The Avenue North, 18-22 Bridge Street, Manchester, M3 3BZ United Kingdom ("we", "us", "our").

This privacy notice explains how we use your personal data we collect.

Where we decide what personal data that we receive direct from you to process and why we are considered the data controller.

Where we are provided with personal data of others as part of a commercial arrangement, we would be considered the data processor. Data processors act on behalf of, and only on the instructions of, the controller.

There are situations when we may be the data controller, data processor or both.

We will ask you or your employer 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) as part of provision of our services. We have in relation to this.

6.1 WHAT IS 'PERSONAL DATA' AND WHAT INFORMATION DO WE COLLECT?

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 may also need to gather personal information about your close family members, dependants or beneficiaries 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 for them or, where appropriate, ask you to pass the privacy information to them

It is important that your personal data is correct so should your information change during your relationship with us, please inform us and/or your employer.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site.

6.2 THE BASIS AND PURPOSES OF PROCESSING YOUR PERSONAL DATA

We collect your personal information in order to provide you with the services for which you or your employer engage us. We also use your data to:

- a. perform administrative activities in connection with our services;
- b. liaise with your employer
- c. liaise with our suppliers
- d. operate and promote our business activities;
- e. carry out background checks / conduct due diligence
- f. help improve our services or develop new services;
- g. for fraud monitoring and prevention;
- h. comply with legal and regulatory obligations.

When we speak with your and / or your employer 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, 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 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 providers relating to the advice we have given 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.

In some circumstances we may ask for information about your ethnic origin, health and medical history (special category data). We will record and use your special category 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.

When we process your special category data we will do so:

- a. with your explicit consent, where this is required by law (should this be the case your employer will obtain your explicit consent to collect and use your data for the purposes described in this Privacy Notice). You may withdraw your consent at any time by notifying us using the details below;
- b. where legislation otherwise permits us to process your special category data (for example, where it is necessary for insurance purposes).

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.

6.3 HOW WE COLLECT YOUR PERSONAL DATA

We will collect and record your personal data from a variety of sources, but mainly directly from you and / or your employer. The information will be usually provided to us during the course of our initial meetings or conversations to establish your circumstances and needs. You and / or your employer will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks 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.

6.4 DISCLOSURE OF YOUR PERSONAL DATA

From time to time your personal data will be shared with the following categories of third parties:

- a. Product providers
- b. Third parties who we believe will be able to assist us with enquiries or applications, or are able to support your needs as identified. These third parties will include:

- i. our compliance advisers (in each case where we believe this to be required due to your particular circumstances)
- ii. your employer
- iii. our business partners for the purposes of fulfilling our contractual obligations to clients
- iv. third party service providers such as entities providing customer service, IT service, email delivery, auditing, insurers and others

Your personal information will also be disclosed to third parties:

- a. Where we are obliged to disclose your personal information under applicable law or regulation
- b. To apply our terms and conditions or any other agreement or to respond to any claims
- c. To protect the rights, property, or safety of our staff, our customers or other persons or to prevent any illegal activity.

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 service and in line with security obligations consistent with this privacy policy and applicable laws.

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.

6.5 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 and prevent it from unauthorised or unlawful processing and against accidental loss, destruction or damage, including unlawful or malicious access by a third party.

The examples of measures we put in place include:

- a. physical access control to our premises
- b. adequate policies including business continuity and disaster recovery procedures
- c. ensuring physical files are locked in cabinets
- d. use of encryption and secure web portals
- e. use of passwords to access our systems
- f. anti-virus software
- g. staff training and awareness.

Although we will make all reasonable efforts to protect personal information which you provide to us, the transmission of information over the internet is not entirely secure. Consequently, 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.

We have in place appropriate policies and procedures designed to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. 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.

6.6 YOUR RIGHTS

You can:

- a. Request an access your personal information – to 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).

You can 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.

- 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). You can also object to our use of your information for direct marketing purposes - we will always act upon your request.

Should you wish to exercise any of the above rights, please contact us using the details below. To enable us to verify your identity and to deal with your request efficiently we ask that you provide a proof of your identity and address and the details of your request, including personal data you wish to access, information that is incorrect and personal data with which it should be replaced.

6.7 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.

6.8 CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review and we will place any updates on our web page and / or inform you of any changes when they occur.



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T: 0161 819 1311 **E:** enquiries@paretofp.com **W:** www.paretofp.co.uk