



Privacy Notice

This privacy notice explains how we use any personal information we collect about you.

What information do we collect about you?

We collect information about you when you engage us for financial advice, financial planning and investment management services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We collate this data by note taking and the completion of questionnaires. Audio recordings may also be made of telephone calls and meetings.

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. Full details of how cookies work is provided on our website www.telfordmann.co.uk

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 will provide a copy of this privacy notice for 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.

Where special category data of a sensitive nature is required we will obtain your explicit consent to collect and process this information. An example of this is where information is required about your health.

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 may 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, audit or legal services as well as product and platform providers that we use to arrange financial products for you. Where you are also a client of Moore Stephens Chartered Accountants we will supply information needed by them to carry out the services

you have engaged them for. We may also be required to forward your data to our regulator, the Financial Conduct Authority when requested.

Where third parties are involved in processing your data we 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. This will include the encryption of data transmitted electronically.

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

How long do we retain 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
- Three years for insurance business
- Indefinitely for pension transfers and opt-out 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 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 below.

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.

How to contact us

If you have any questions about our privacy policy or information we hold about you please contact us by email at dataprotection@telfordmann.co.uk or write to us at Ironstone Place, Kettering, Northants, NN14 1FN.