

Grosvenor Consultancy Ltd - Data Protection Notice

The purpose of this Notice

When we provide our services to you, we will collect personal information about you (and others) and we want to be open and transparent with you as to the types of information we collect about you, why we collect it, how we use it and who we may share it with.

The data controller of your personal information is Grosvenor Consultancy Ltd registered at 76 Macrae Road, Eden Office Park, Ham Green, Bristol, BS20 0DD (with company number 3509936) (“we”, or “us”, or “our”).

By providing your personal data you acknowledge that we will only use it in accordance with this Notice.

It is important that you read this statement together with any other privacy notice we may provide on specific occasions, so you are aware of how and why we are using your personal data.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Notice in the 'How to contact us' section.

How will we use your personal data?

Data protection laws require that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept secure and confidential;
- Kept only as long as necessary for the purposes we have told you about

How do we ensure the security of your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to use your data. They will only process your personal data on our instructions and are subject to a duty of confidentiality. We have put in place procedures 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. As part of our data security measures we ensure that we train our employees and have appropriate data protection policies in place to support our compliance.

What type of personal information will be processed and why?

We may ask you to provide personal information by completing hard copy forms and documents or by corresponding with us by phone, e-mail, letter, Personal Finance Portal (PFP) or otherwise or during the course of our meetings with you.

Types of personal information	Why we collect it
<p>Identity details including your name and date of birth.</p> <p>We may ask for copies of identity documents in which case we may collect details including your place of birth and residential address.</p>	<ul style="list-style-type: none"> • To carry out money laundering and financial checks and for fraud and crime prevention and detection purposes. • We will only ever use copies of identity documents for this purpose. • We collect and process this personal information in order to comply with our legal and regulatory requirements.
<p>Your contact details including your name, postal, phone and email address(es) and other personal details about you including your title, job title, marital status and date of birth.</p>	<ul style="list-style-type: none"> • To contact you in order for us to manage, administer and provide our services to you. • To respond to any correspondence and service-related enquiries you send to us in respect of our services. • To discuss products or services for which you apply or may be interested in applying for. • To manage any applications you make for products or services. • To communicate any updates to you including any changes to our services, the terms and conditions of any services which we have provided to you, any changes to this Notice and to our websites. • To contact you in order to receive your feedback on our services and to participate in related surveys.
<p>Financial information relating to you, including pension contributions and current value, salary, bank account balances, credit card balances details of investments.</p>	<ul style="list-style-type: none"> • To evaluate your eligibility for products, including making credit searches with credit reference agencies and fraud searches with fraud prevention agencies. • To enable us to advise you on your financial circumstances and the appropriateness of specific courses of action and products. • We collect and process this personal information for our legitimate business interests. • To enable you to make payments for our services. • We collect and process this personal information as is necessary for the entry into and performance of any agreements between us (i.e. to assess whether you are eligible for products).
<p>Details of your dependents (name, address and date of birth)</p>	<ul style="list-style-type: none"> • To enable us to provide you with services that you have requested that

	would involve, or have an impact on, your dependents (who may be adults or minors). Where those dependents are adults, please make sure that you have their permission to provide us with their personal information.
Details of contact that we have had with you such as meetings with you, fact-finding discussions and documentation, recommendations, referrals and quotes.	<ul style="list-style-type: none"> • To allow us to provide a professional service to you and to contact you with information about other services of ours that we think you may be interested in). • We collect and process this personal information for our legitimate business interests.
Details of services you have received.	
Client experience and other feedback and information you provide to us.	<ul style="list-style-type: none"> • To review your feedback and experience with us so that we can improve our products and services for you and for our other clients. • We collect and process this personal information for our legitimate business interests (<i>Please see section below entitled "When we record communications" for more information</i>).
Information about complaints and incidents.	
Written records of calls we receive or make.	
All of the personal information described above.	<ul style="list-style-type: none"> • We may disclose your personal information to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a court Order, regulatory authority or any other third party with the lawful right to request and receive the personal information we hold about you (including law enforcement agencies and tax authorities). • We may also use your personal information where it is necessary for us to take legal advice in order to establish our legal rights, to bring a claim against you or any related parties or to defend a claim from you or any related parties. • We collect and process this personal information for our legitimate business interests including to carry out our own internal business planning, compliance, training, audit and quality assurance purposes.

Depending upon the types of products and services you require, we may also need to collect information from and about you which the law considers to be sensitive, such as data about your physical or mental health, which we refer to as “special category personal data”. The special

category personal data that we may ask you to provide, and the reasons why we ask you to provide it, are as follows:

Types of special category personal data	Why we collect it
Information about your physical or mental health or condition.	Certain products and services that you request may require this information. Specifically, in order for us to advise you on and to submit applications for health or life insurance products and services, we will need to collect information relating to your physical and mental health in order to obtain accurate quotes and to advise on the suitability of products (as insurance premiums and eligibility for products will in part depend on your physical and mental health). We will usually collect this information in the course of meetings with you, on specific questionnaires or in the process of completing an application form for such products and services.
Information about your sex life or sexual orientation.	Some providers may ask for this information in the course of your application for their products or services. We will never ask for this information for our own purposes.
Information about your racial or ethnic origin	Some providers may ask for this information in the course of your application for their products or services. We will never ask for this information for our own purposes.

We will only process the special category personal data listed above with your explicit consent. We ask for your consent to the processing of this data at the end of this Notice. You may choose not to provide us with this consent. However, please note that if you do not provide us with your consent to collect and process the information listed in the table above:

- We may not be able to advise you fully in respect of certain products and services which require this information (in particular those relating to health or life insurance).
- your application may be rejected by the providers of products and services which require this information; or
- The quotes for such products and services may be higher than would be the case if this information were provided.

In some circumstances, we may receive information about you from third parties. In particular, we will receive information about you from Credit Reference Agencies and Fraud Prevention Agencies. This may include details of the products and services you have applied for, those lenders, finance and credit organisations with whom you have (and have had) an agreement with, the amounts advanced, the amount and frequency of repayments and whether you have made your repayments on time and in full. This will help us make the best possible assessment of your financial situation before we decide whether we can provide you with our services and/or recommend any specific products and services. It is in our legitimate interests to process your personal information for this purpose. We may also ask you to provide Letters of Authority to allow us to receive information about you from providers.

When we record communications

We, and persons acting on our behalf, may keep a record and/or monitor communications (emails, instant messaging, chat rooms, fax and other electronic communications) between our staff and you. We only keep records of communications between us in order to comply with our legal and regulatory requirements - as a regulated financial adviser, the law requires us to keep a record of these communications.

Who might my personal information be shared with?

We may disclose your personal information to the following categories of recipients:

- to providers of financial services, insurance and investment products and services in respect of whom you request us to submit applications on your behalf and to receive updates from such providers in order for us to provide our services to you throughout the lifetime of our relationship with you;
- to our suppliers and partners in order for them to help us provide our services to you, this includes:
 - our IT systems providers to assist us with providing you with an efficient, modern and professional service;
 - our suppliers of audit and regulatory compliance support services who may review our records containing your personal information in order to audit and report to us on our compliance with applicable laws and regulatory requirements;
 - our accountants, solicitors, insurer(s) and insurance broker(s) and any other provider of professional services to us;
- to Credit Reference Agencies and Fraud Prevention Agencies to help us make the best possible assessment of your financial situation before we decide whether we can provide you with services. We are also required to provide information to such agencies so that they can update the information which they hold about you and which they may share with other organisations;
- to other financial institutions or regulatory bodies with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes;
- to a prospective buyer (and its agents and advisers) in the event we intend to sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your personal information could form part of one of the assets we sell, provided that we inform the buyer it must use your personal information only for the purposes described in this Notice. We will never rent or sell your personal information other than as part of a sale of our business;
- to any national and/or international regulatory, enforcement body, government agency or court where we believe disclosure is necessary
- as a matter of applicable law or regulation (including where we are required by law to provide information to organisations such as HMRC),
- to exercise, establish or defend our legal rights, or
- to protect your vital interests of those of any other person; and
- to any other person with your consent to the disclosure or where we are permitted to do so by law.

Our legal basis for processing personal information

Our legal basis for collecting and using your personal information will depend on the personal information concerned and the specific context in which we collect it. In respect of the personal

information and the purposes for which we may process your personal information which are set out in this Notice, we have confirmed the legal basis upon which we collect and process your personal information in the 'What type of personal information will be processed and why?' section above.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you or with your explicit consent, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

International Data Transfers

Amazon Web Services are used by Intelliflo, our back office provider, to enable our financial advisers to connect to the Intelligence Office platform API, use Intelligent Office store applications, and to enable specific forms of messaging between Intelligent Office platform components. It is possible that all data stored within Intelligent Office (All data that you provide to us) could be transferred through AWS, but Intelliflo do not use Amazon services outside of the EEA, and do not permanently store your data in the Amazon Web Services infrastructure in a non-encrypted format. There will be encrypted copies of database backups from Intelligent Office in AWS. Your data is protected through contractual provisions between Intelliflo and AWS, and the UK Data Protection Bill.

Your data protection rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below;
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. For specific information about our processing of your sensitive category

personal data with your consent, please see the *"Your consent to us processing your special category personal data"* heading below.

- You have the right to complain to the Information Commissioners Office (ICO) the UK supervisory authority for data protection issues about our collection and use of your personal information. You can contact the Information Commissioner's Office at:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Or

Telephone - 0303 123 1113

www.ico.org.uk

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate need to do so, for example:

- to provide you with a product or service you have requested us to provide,
- to perform our contractual obligations to you;
- to comply with applicable legal, tax or accounting requirements;
- to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, regulatory authority or ombudsman.

We will keep personal data for as long as you are a client of Grosvenor Consultancy Ltd. Thereafter we may keep your information for up to 7 years to enable us to respond to any questions or complaints and to maintain records where we are required to do so. We may keep data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons, for example in relation to a pension contract.

To determine the appropriate retention period we will consider the type of contract, sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process the personal data, whether we can achieve those purposes through other means and any applicable legal requirements to retain such personal data for prescribed periods. Where we retain your data we will make sure your privacy is protected and only use it for the purposes described above.

In some circumstances we may anonymise or pseudonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Updates to this Notice

We may change or update this Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

How to contact us

If you would like to contact us in relation to this Notice or if you have any other questions in respect of our processing of your personal information, please contact us at Grosvenor Consultancy Ltd, 76 Macrae Road, Eden Office Park, Ham Green, Bristol, BS20 0DD, Telephone 01275 373348.