REEVES INDEPENDENT
EST 1996

Pension, Investments & Retirement Advice

# Reeves Independent

## Privacy Policy

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

## Why should you read this document?

During the course of dealing with us, 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 (known as '**Personal Data**').

This document is important as it allows us to explain to you what we will need to do with your Personal Data, and the various rights you have in relation to your Personal Data.

## What do we mean by Personal Data?

In the context of providing you with assistance in relation to your investment, pension or protection/insurance requirements, your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information (including salary, bonus schemes, overtime, sick pay, other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- 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)
- Any pre-existing investment, pension or protection/insurance products and the terms and conditions relating to these

Where you ask us to assist you with your insurance needs, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (known as 'Special Data'). We will record and use your Special Data in order to make enquiries of insurance providers in relation to insurance 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 information on our systems that relates to those children and potentially, to their Special 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 ('Criminal Disclosures'). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use your Special Data and any Criminal Disclosures in the same way as your Personal Data generally, as set out in this Privacy Notice.

Information on Special Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

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.

## 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 Personal 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 Data is required, we will obtain your explicit consent in order to collect and process this information.

## 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 and preferences in relation to investments, pensions or protection/insurance. You may 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 voters roll.

We use technology solutions to assist in the collection of your Personal Data, eg. software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner.

With regards to electronic identification checks, we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

## Information about connected individuals

In order to provide our service to you effectively, we may need to gather personal information about your close family members and dependants. 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 to them or, where appropriate, ask you to pass the privacy notice on to them.

## 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. In the course of handling your Personal Data, we will:

- Record and store your Personal Data in our paper files, mobile devices and on our computer systems (websites, email, hard drives and cloud facilities). This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit your Personal Data to product providers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that providers/lenders may raise
- Use your Personal Data for the purposes of responding to any queries you may have in relation to any investment, pension or protection/insurance policy you may take out, or to inform you of any developments in relation to those products and/or polices of which we might become aware

## Who might we share your information with?

In order to deliver our services to you effectively we may send your details to third parties, such as compliance, paraplanning and accountancy or legal services, as well as product/platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data, we will 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 the 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.

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 this privacy notice.

If you wish to know the names of these third parties please contact us for further information.

On occasion, we will use your Personal Data for contractual responsibilities we may owe our regulator The Financial Conduct Authority (FCA), 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.

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

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.

## How can I access the Personal Data 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 Data, please email or write to us using the contact details in the 'how to contact us' section.

We have an obligation to ensure that your Personal Data is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

## Security and retention of 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.

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:

·Five years for investment business
·Three years for insurance busines

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. In any case, we will not keep your Personal Data for longer than 10 years after our relationship with you has ended.

## Your rights in relation to your Personal Data

You can:

- Request copies of your Personal Data that is under our control
- Ask us to further explain how we use your Personal Data
- Ask us to correct, delete or require us to restrict or stop 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)
- Ask us to send an electronic copy of your Personal Data to another organisation should you wish
- 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)

## Marketing

If you agree, we may email you about other products or services that we think may be of interest to you and may suit your needs and circumstances.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, you may opt out at a later date. Please contact us by email or post.

Unless you agree, we will not share your information for marketing purposes with other companies.

## Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit http://www.allaboutcookies.org/.

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

## Other websites

Our website contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

## Changes to our privacy policy

We keep our privacy policy under regular review and we will inform you of any changes when they occur. This privacy policy was last updated in May 2018.

## 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 Nigel Reeves.

Email: nigel@reevesifa.com

Address: Reeves Independent, National Advice Centre, 2nd Floor, Park View House, Front Street, Benton, Newcastle Upon Tyne, NE7 7TZ

If we feel we have a legal right not to deal with your request, or to action, it in 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.

## What can you do if you are unhappy with how Your Personal Data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the United Kingdom, this is:

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