Privacy Notice / Data Protection Notice

**Introduction**

This notice provides information concerning our collection and use of personal data. If you have any queries regarding this statement, please do not hesitate to contact us.

**What Data We Collect & What Do We Do With It**

To provide financial advisory services, we will obtain personal information from you concerning your finances, circumstances, objectives, and other relevant details. We will collect, store and process this information.

**Legal Basis**

We collect, control and process your personal information because this is necessary to provide you with information, answer any queries you may have and provide our services to you. Contractual necessity is, therefore, the lawful basis for collecting, controlling and processing your personal details and those of your employees and service providers other than *special category* personal data for which we require your consent to process. We may need to consider health information as it is essential for insurance underwriting purposes, which includes all insurance-based products. In this case, we are allowed to process special category data based on necessity to contract.

Special category personal data*:*

* Racial or ethnic origin
* Political opinions
* Religious or philosophical beliefs
* Trade union membership
* Genetic data
* Biometric data
* Data concerning health
* Data concerning sex life or sexual orientation

We would discuss with you the need to provide such data before you give this information.

It is entirely up to you whether you choose to provide us with any information. If you choose not to, we may be unable to assist you.

**Sharing Your Data**

During our work with you, we will share your data with product and service providers; we may also share your data with compliance monitoring & support organisations and regulatory bodies who are also ‘Data Controllers’. We will only use data controllers and processors registered with a supervisory authority in a satisfactory jurisdiction (as indicated by the UK Information Commissioner’s Office) and on terms which comply with Data Protection law in the UK before we share any of your data.

We use external data processors that will hold information for the following purposes:

* Secure file sharing
* Data backup
* Dissemination of information
* Report writing
* Research

Otherwise, we will not share your personal information with other companies without your express authority except if our organisation is sold, or we must do so by law.

**Marketing**

The information we collect about you is used solely for the purposes for which it was provided. We will never share your data for marketing purposes. Any communication about our services will be sent on the basis of contract or legitimate interests.

**Retention**

We will keep your personal data throughout our business relationship. At the end of any contractual relationship, we must continue to hold personal data under current legislation for varying periods and, in some circumstances, indefinitely. We may also consider it necessary to keep data beyond these timescales to defend any future legal action. Where we no longer need regular access to your data, we will transfer your data to a secure archive to avoid unnecessary processing.

**Your Rights**

Under data protection law, you have the right to ask us for a copy of the information we hold about you and to have any inaccuracies corrected or removed. You may also ask us to delete or cease processing all personal data held by us or any processor with whom we have shared your data. We may not always be able to comply with a deletion request, but you can ask us to cease processing your data.

In addition, you have the right to be informed about the data we collect, where it is located, with whom it is shared, the processing we undertake, and to question any automated decision-making processes.

To do this, or if you require more information, please get in touch with us; our contact details are below.

**Complaints**

The UK Information Commissioner’s Office is our supervising authority, where you can refer any complaints about data protection for more information.

**Contact**

For any queries about data protection, please contact:

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| Contact name | William Gillis |
| Address | 170 Rein Road, Tingley, Wakefield WF3 1JE |
| Telephone | 07886 825 835 |
| Web | [www.grml.co.uk](http://www.grml.co.uk) |