



Andrews Gwynne LLP Privacy Policy

Andrews Gwynne LLP treats the privacy of its clients and website users very seriously and we take appropriate security measures to safeguard your privacy. This Policy explains how we protect and manage any personal data* you share with us and that we hold about you, including how we collect, process, protect and share that data.

*Personal data means any information that may be used to identify an individual, including, but not limited to, first and last name, a home or other physical address and an email address or other contact information, whether at work or at home.

How we obtain your personal data

Information provided by you

You provide us with personal data either on your Financial Fact Profile, on our clienthub, during face to face meetings or over the telephone. This includes name, address, date of birth, email address and your financial information. We use this information in order to manage and administer your account with us. We may also keep information contained in any correspondence you may have with us by post or by email. We also record telephone conversations.

We may obtain sensitive medical information directly from you or your medical professionals in relation to assessment relevant for policy applications. The provision of this information is subject to you giving us express consent. If we do not receive this consent from you, then we may be unable to provide you with our services. Where you have given express consent you also have the right to withdraw that consent. The provision of personal data is essential for us to be able to carry on investment business on your behalf, including verifying your identity when you contact us. This means that the legal basis of our holding your personal data is for the performance of a contract.

Information we get from other sources

We only obtain information from third parties if this is permitted by law. We may also use legal public sources to obtain information about you, for example, to verify your identity.

How we use your personal data

We use your personal data to manage and administer your investments. We undertake at all times to protect your personal data, including any health and financial details in a manner which is consistent with the requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data in storage.

Do we use your personal data for marketing purposes?

Any information that you choose to give us will not be used for marketing purposes by us. We will hold your personal data only for the purposes of administering and managing your investments and processing any policy applications that you may make.

Sharing information

We will keep information about you confidential and we will only disclose your information with other third parties with your express consent with the exception of the following categories of third parties:

- Insurance companies, regulatory authorities and other fraud prevention agencies for the purposes of fraud prevention and to comply with any legal or regulatory issues and disclosures;
- Anyone to whom, we may transfer our rights and duties under any agreement we have with you;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so
- Any contractors or agents that provide a service to us or act as our agents on the understanding that they keep the information confidential.

Transfer of your personal data outside of the European Economic Area (EEA)

We do not currently transfer your personal data outside of the EEA. If in the future we transfer your personal data, in accordance with the terms of this Policy outside of the EEA, we will make sure that the receiver agrees to provide the same or similar protection as we do and that they only use your personal data in accordance with our instructions.

How long do we keep this information about you?

We keep information in line with FCA and Money Laundering regulations. These retention periods are in line with the length of time we need to keep your personal information in order to manage your investments and handle any queries or complaints from the FCA or FSCS. They also take into account our need to meet any legal, statutory and regulatory obligations. These reasons can vary from one piece of information to another. In all cases, our need to use your personal information will be reassessed on a regular basis and information which is no longer required will be disposed of.

Merger

In the event that we sell all or part of our business, or merge with another organisation, we may transfer personal information that we have collected as described in this privacy notice, along with our other business assets, to the organisation that we are selling to or merging with.

Data subject rights

Subject access requests

The General Data Protection Regulation (GDPR) grants you (the 'data subject') the right to access particular personal data that we hold about you. This is referred to as a 'subject access request'. We shall respond promptly, and certainly within one month from the point of receiving the request and all necessary information from you. Our formal response shall include details of the personal data we hold about you, including the following:

- sources from which we acquired the information
- the purposes for processing the information; and
- persons or entities with whom we are sharing the information.

Right to rectification

You, the data subject, shall have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold concerning you. Taking into account the purposes of the processing, you, the data subject, shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure

You, the data subject, shall have the right to obtain from us the erasure of personal data concerning you without undue delay subject to certain exceptions.

Right to restriction of processing

Subject to exemptions, you, the data subject, shall have the right to obtain from us restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by you, the data subject, and is restricted until the accuracy of the data has been verified;
- b) the processing is unlawful and you, the data subject, oppose the erasure of the personal data and instead request the restriction in its use;
- c) we no longer need the personal data for the purposes of processing, but it is required by you, the data subject, for the establishment, exercise or defence of legal claims;
- d) you, the data subject, have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

Notification obligation regarding rectification or erasure of personal data or restriction of processing

We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall provide you, the data subject, with information about those recipients if you request it.

Right to data portability

You, the data subject, shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from us.

Right to object

You, the data subject, shall have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, the data subject, or for the establishment, exercise or defence of legal claims.

Right to not be subject to decisions solely on automated processing

We do not carry out any automated processing, which may lead to an automated decision based on your personal data.

Invoking your rights

If you would like to invoke any of the above data subject rights with us, please write to the Data Protection Officer at Andrews Gwynne LLP, Aquilifer House, 2 Kelso Road, Leeds, LS2 9PW or email info@andrewsgwynne.co.uk.

Accuracy of information

To provide the highest level of customer service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear, and we carefully consider any challenges to the accuracy of this information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

Important Information

Questions and queries

If you have any questions or queries which are not answered by this Privacy Policy or have any potential concerns about how we may use the personal data we hold, please write to the Data Protection Officer at Andrews Gwynne LLP, Aquilifer House, 2 Kelso Road, Leeds, LS2 9PW or email info@andrewsgwynne.co.uk.

Policy Changes

This Privacy Policy is regularly reviewed. This is to make sure that we continue to meet the highest standards to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. We suggest that you review this Privacy Policy from time to time to ensure that you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy is available on request.

If you have a complaint

If you have a complaint regarding the use of your personal data or sensitive information, then please contact us by writing to the Data Protection Officer at Andrews Gwynne LLP, Aquilifer House, 2 Kelso Road, Leeds, LS2 9PW or email info@andrewsgwynne.co.uk and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 01625 545745 or 0303 123 1113. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.