

GENERAL DATA PROTECTION REGULATION

Customer Privacy Notice

INTRODUCTION

GDPR (General Data Protection Regulation) is European legislation introduced on 25 May 2018. It harmonises and strengthens existing Data Protection legislation.

KEY INFORMATION

- We only use your personal data for the purpose for which you provided it, to provide financial advice.
- We only share selected data where it is necessary for us to do so to operate our business and provide our service or if we are required to do so by law. Otherwise, we will always ask for your consent.
- You can ask us what personal data we hold about you in order to correct and update it if anything changes.

WHO WE ARE

We are Clairville York Limited. We are both a Data Controller and a Data Processor. We provide independent financial advice to private, corporate and trust clients. In order to provide suitable and appropriate advice, we must obtain and hold sufficient personal data about your financial and personal circumstances, your health, your objectives and your immediate family situation. We also need to keep this data up-to-date and store it securely.

WHAT INFORMATION WE COLLECT ABOUT YOU

This includes:

- Personal details, such as name, date of birth, address, phone numbers and email address.
- Documentation confirming your identity, tax residency and legal authority.
- Information relating to your finances, such as your assets, liabilities, incomes, expenditure, pensions, investments and protection policies.
- Information relating to your health and immediate family circumstances.

HOW WE COLLECT YOUR INFORMATION

You provide us with most, if not all, of the data directly. We may also obtain some of it from third parties, such as insurance and investment companies, but only with your authority.

LAWFULNESS OF PROCESSING

Our processing of your data shall be lawful only if and to the extent that at least one of the following applies:

- You have provided your **consent**.
- Processing is necessary for the **performance of our contract** to provide you with our services.
- Processing is necessary for **compliance with a legal obligation**.
- Processing is necessary for the purposes of **legitimate interests** of the controller.

HOW WE USE YOUR INFORMATION

We, as a Data Controller, collect and use personal information about you to facilitate the contractual relationship in place between us and to provide you with our services.

To provide our services to you, or your employer, in an effective and efficient way, we require to collect, store securely and process personal information about you. This processing will include:

- Delivering financial and tax planning advice, arranging and maintaining financial plans, such as pensions, investments and protection products (reason for processing is performance of our agreement or contract with you).
- To verify your identity (reason for processing is to comply with our legal obligation).
- To contact you by post, email or telephone about important changes which may affect your financial plans (reason for processing is performance of our agreement or contract with you).
- Keeping our records and your personal data up-to-date (reason for processing is both performance of our contract and our legal obligation for record keeping).
- Processing your financial transactions (reason for processing is performance of our contract).

- Prevent and detect crime or fraud (reason for processing is our legal obligation).
- We do not use your data to market products or services to you. We do however issue newsletters and other information relevant to your financial planning. We do market to you we would only do so where we have your consent. (reason for marketing being that you have provided consent).
- We will not share your data with third parties for marketing purposes.

If we do not collect and hold your personal data, we will not be able to provide you with our services.

HOW WE SHARE YOUR DATA

- We will share your data with pension and investments companies, mortgage lenders and insurance companies in order to arrange and maintain your financial plans and policies and with ID verification systems to comply with our legal obligation to verifying your identity.
- We will share your personal data with our secure client management system, Intelligent Office, email through Microsoft Office 365 and in secure cloud storage facilities, including Dropbox for Business and Amazon Web Services.
- Your information is stored and processed within the UK and European Economic Area (EEA). Where it is processed outside of the EEA we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK or EEA data privacy laws.
- Wherever we share your personal information we do so in line with our obligations to keep your information secure.

HOW WE STORE YOUR PERSONAL DATA

Security of your personal data is important to us. We store your data securely 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.

HOW LONG WE RETAIN YOUR INFORMATION

We will keep your personal information for as long as is necessary to comply with our legal obligations. In most cases this will be for the rest of your life and possibly beyond. There are various reasons why we must keep your records for longer time periods, such as where the record is relevant to legal proceedings, a criminal investigation, exercise or defence of a claim or where the record is subject to a statutory retention period, for example data in relation to pension transfers. In order to meet our legal obligations, we will retain your personal data until after your death, and in some cases, where you are planning for and providing for them, the deaths of your family members.

DATA SUBJECT RIGHTS

It is your data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time.

YOU ALSO HAVE RIGHTS TO

- ask what data we hold about you, and to make sure it is correct and up-to-date.
- request a copy of your personal data.
- ask us to transfer a copy of your personal information to another Controller, e.g. a competitor.
- ask us to restrict processing or delete your personal data, also known as the request to be forgotten.

HOW TO COMPLAIN

If you are unhappy about how we have used your personal information, you can contact our Compliance Officer, Leslie.Sharpe@cyfsl.co.uk. If you are unhappy with the outcome you should contact the Information Commissioner's Office (ICO). Find out how at <https://ico.org.uk/concerns> or call their helpline on 0303 123 1113.

HOW TO CONTACT US

If you need any further information or have any questions, please contact us at privacy@cyfsl.co.uk or by calling Angela Butler on 020 8642 3899. Clairville York Ltd, 22-34 High Street, Cheam SM3 8RL