



ANDREW BOURNE & CO.

Independent Financial Advisers Ltd

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Privacy Policy

This Privacy Policy explains how we use any personal information we collect about you and this complies with the General Data Protection Regulation (GDPR).

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We collect information about you when you engage us for financial advice or mortgage advice services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary, for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

This means we are data controllers for these advice giving services and therefore responsible for managing this client data and ensuring compliance.

HOW IS YOUR INFORMATION COLLECTED?

Personal information will be gathered about you and your family as part of our adviser's fact finding meeting and any other meetings with you.

Where you are referred to us by an independent introducer, they will ask for your agreement to send this information to us to provide you with advice and guidance.

We will also collect data about you and your family from other people such as providers who you hold policies with.

SENSITIVE PERSONAL DATA

As explained above there are certain categories of personal data that are sensitive by nature. These categories include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health.

Depending on the nature of the products and services that you engage us for we may need to obtain your sensitive personal data particularly in relation to health. In the case where we need to process special category (sensitive) data as described above we will need to ensure that the information we hold is accurate and current.

INFORMATION ABOUT CONNECTED INDIVIDUALS

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. 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 Policy for them or, where appropriate, ask you to pass the Privacy Policy information to them.

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 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 category data is required, we will obtain your explicit consent in order to collect and process this information.

HOW IS YOUR INFORMATION USED AND ON WHAT LAWFUL BASIS?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances, where:

- we need to perform the contract we have entered into with you.
- we need to comply with a legal obligation.
- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- we have your consent.

Primarily, we use your data and data about your family's circumstances to provide financial advice to you and complete transactions on your behalf. We analyse and assess your data to maintain and develop our relationship with you and meet our contractual obligations to you as detailed in our client agreement.

Where we are relying on legitimate interests to process your information, those legitimate interests are:

- when we feel that the services we offer can be improved.
- where we become part of another company / group of companies.

We do not carry out any automated decision making.

WHO MIGHT WE SHARE YOUR INFORMATION WITH?

Third Party	Details
Other Professional Service Providers	Depending on the instructions we receive from you we may pass your data to other professionals to enable us to provide advice most suited to your circumstances. We will always notify you if we are going to share your information in this way and these professionals would all be based within the UK. This would usually be referrals to accountants, solicitors, tax advisers and sometimes to specialist advisers in the financial and insurance industry where you may benefit from the expertise of such third parties. We and any third-party specialist advisers to whom we introduce you, will pass your data to the relevant organisations if you agree to purchase or amend policies and products.
The Financial Conduct Authority	We may be required to share your data with our regulator, the Financial Conduct Authority, or the Financial Ombudsman and other third parties including our auditors or insurers.
Insurance / Mortgage Providers	We also make checks with organisations with which you have policies of insurance and investments and with your mortgage provider. These checks are to help us with our legal obligations and to ensure that we provide you with advice that suits your circumstances. The scope and extent of the gathering of information from third parties depends on what type of service you are taking from us.

Purchasers /
Investors

We may share your information with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets or who are stakeholders or investors in our business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with data protection laws. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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 they 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.

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.

If you agree, we may contact you about other products or services that we think may be of interest to you.

We will not share your information for marketing purposes with other companies.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

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 generally:

- three years for insurance business.
- three years for mortgage business.
- five years for investment business.
- five years for money laundering verification details.
- indefinitely for pension transfers and opt-outs.

These are minimum periods, during which we have a legal obligation to retain your records.

Pension transfers and opt-outs aside, we do not intend to keep your personal data for longer than 7 years after our relationship with you has ended. However, we reserve the right to retain data for longer where we believe it is in our legitimate interests to do so.

You have the right to request deletion of your personal data and we will comply with this request subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

DATA SECURITY AND STORAGE

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instruction and they 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.

Your information will not be transferred or stored outside of the European Economic Area.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested we may not be able to perform the contract we have entered into with you, (such as providing you with accurate financial advice), or we may be prevented from complying with our legal obligations, (such as under Money Laundering Regulations).

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

HOW CAN I ACCESS THE INFORMATION 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 information, please email or write to us using the details in the **HOW TO CONTACT US** section.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

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

MARKETING

We would like to send you information about our products and services which may be of interest to you.

If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please email or write to us using the details in the **HOW TO CONTACT US** section.

HOW TO CONTACT US

Please contact us if you have any questions about our Privacy Policy or information, we hold about you.

Write to us at:

Andrew Bourne & Co Independent Financial Advisers Limited
Regent House
1 Stoughton Road
Oadby
Leicester
LE2 4DS

By phone: 0116 272 0770 (option 1)

By email: ifa@abourne.com

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 UK this is:

Write to them at:

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

By phone: 0303 123 1113 (local rate)

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 on 18/02/2021.