

## Your privacy

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

*Italicised* words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

## Who we are

Penney, Ruddy & Winter Limited collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

We are a company registered in England and Wales (8325152) whose registered office is at Becket House, 2<sup>nd</sup> Floor Mezzanine, 36-37 Old Jewry, London EC2R 8DD. Penney, Ruddy & Winter Limited is authorised and regulated by the Financial Conduct Authority. Our Financial Services Register number is 626355.

We provide you with investment and/or insurance advice.

## The personal data we collect and use

In providing our service to you we may collect the following personal data when you provide it to us:

- *Your contact information*, including name, address, telephone and email address information
- *Your identity information*, including date of birth, passport and driving licence details, National Insurance number, address verification (e.g. utility bills)
- *Financial information*, including your income and expenditure, property, investments and information about other assets, and any mortgage loans and other secured and unsecured loans and credit cards
- *Your employment status*
- *Information about your lifestyle*

- *Health information*
- *Details of any vulnerability*
- *Details of your dependents and/or beneficiaries under a policy (If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.)*
- *Information about any existing products and policies*

## Information collected from other sources

We also obtain personal data from other sources in providing our *intermediary services*. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From *product providers*:
  - *product details*
- From identification and verification checking agencies:
  - *identity information*
  - *sanction check information*
- Solicitors and accountants:
  - Details of wills and/or Trusts
  - Business accounts

## How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> <li>• To provide you with intermediary services</li> </ul>	Performance of a contract Consent for special categories of data	Providers and platforms
<ul style="list-style-type: none"> <li>• To apply for quotations for protection on your behalf</li> <li>• To apply for products on your behalf</li> </ul>	Performance of a contract Consent for special categories of data	Product providers, platforms
<ul style="list-style-type: none"> <li>• To retain records of any services or advice provided to you by us in order to defend legal claims or complaints</li> </ul>	Legitimate interests	External suppliers of data storage and data hosting services to retain records on our behalf.



## Chartered Financial Planners

www.penneyruddywinter.co.uk Becket House, 2nd Floor Mezzanine, 36-37 Old Jewry, London, EC2R 8DD Tel: 0203 515 1500 Email: admin@prandw.co.uk

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## Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- *health information and lifestyle information* when providing *intermediary services* in relation to a protection insurance product

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

## Whether information must be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data for us to provide you with *intermediary services*.

## How long your personal data will be kept

We only retain your data for so long as it is necessary to fulfil the purpose for which it was collected. There are regulatory and legislative requirements which oblige us to keep certain data for longer, and to comply with those regulatory requirements we keep that data for seven years. In very limited circumstances, we may be required to keep some specific information for longer, for example, pension transfer information, but we regularly review our retention obligations to ensure we don't keep personal information longer than we're legally obliged to.

If you want details of the statutory retention periods for various product types please contact us and we will obtain the latest legal position on your behalf.

## Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area. However, product providers, lenders and investment managers may administer your policy, any existing policies you may have with them and provide other services, from centres in countries outside Europe (such as India and the USA). Such countries do not have the same data protection laws as the United Kingdom or the EEA. However, they are required to put into place a European Commission approved contract that that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

## Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive, or the data request is complex, or you ask for multiple copies of the same information. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up *our* response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

### To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

### To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information) or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.



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We may not always be able to comply with your request, for example where we need to keep using your personal data to comply with *our* legal obligation or where *we* need to use your personal data to establish, exercise or defend legal claims.

### **To restrict our use of personal data**

You can ask that *we* restrict *our* use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and *we* need to verify it;
- where *our* use of your personal data is not lawful, but you do not want *us* to erase it;
- where the information is no longer required for the purposes for which it was collected but *we* need it to establish, exercise or defend legal claims; or
- where you have objected to *our* use of your personal data, but *we* still need to verify if *we* have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where *we* have your consent to use it; or *we* need to use it to establish, exercise or defend legal claims, or *we* need to use it to protect the rights of another individual or a company.

### **To object to use of personal data**

You can object to any use of your personal data which *we* have justified based on our legitimate interest if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, *we* may continue to use the personal data if *we* can demonstrate that *we* have compelling legitimate interests to use the information.

### **To request a transfer of personal data**

You can ask *us* to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where *we* use your personal data to perform a contract with you, or where *we* asked for your consent to use your personal data. This right does not apply to any personal data which *we* hold or process outside automated means.

### **You can contact us for more information**

If you are not satisfied with the level of information provided in this privacy notice, you can ask *us* about what personal data *we* have about you, what *we* use your information for, who *we* disclose your information to, whether *we* transfer it abroad, how *we* protect it, how long *we* keep it for, what rights you have, how you can make a complaint and where *we* got your data from.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer at [charliee@prandw.co.uk](mailto:charliee@prandw.co.uk) or Becket House, 2<sup>nd</sup> Floor Mezzanine, 36-37 Old Jewry, London, EC2R 8DD;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

### **Keeping your personal data secure**

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. *We* limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. *We* will notify you and any applicable regulator of a suspected data security breach where *we* are legally required to do so.

### **Our supervisory authority**

If you are not happy with the way *we* are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

### **How to contact us**

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information *we* hold about you.

If you wish to contact our Data Protection Officer, please send an email to [charliee@prandw.co.uk](mailto:charliee@prandw.co.uk) or write to Becket House, 2<sup>nd</sup> Floor Mezzanine, 36-37 Old Jewry, London, EC2R 8DD.



## **Chartered Financial Planners**

[www.pennyruddywinter.co.uk](http://www.pennyruddywinter.co.uk) Becket House, 2nd Floor Mezzanine, 36-37 Old Jewry, London, EC2R 8DD Tel: 0203 515 1500 Email: [admin@prandw.co.uk](mailto:admin@prandw.co.uk)

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## Declaration

I/We consent for Penney, Ruddy & Winter Ltd to hold and process My/Our personal data for the purposes of financial advice, and I/We authorise the transfer of personal information, on a confidential basis and in accordance with the Data Protection Act 1998 and the General Data Protection Regulations 2018, between Penney, Ruddy & Winter Ltd and any relevant third parties.

I/We agree that Penney, Ruddy & Winter Ltd, or any such third party may contact me in the future by any means of communication considered appropriate at the time.

If there is a means of communication that you **DO NOT** wish us to use, please indicate by ticking the appropriate box(es) below:

### Client 1

Post  Telephone  Email  SMS

### Client 2

Post  Telephone  Email  SMS

Client 1

Signature:

\_\_\_\_\_

Print Name:

\_\_\_\_\_

Date of

Signature:

\_\_\_\_\_

Client 2

Signature:

\_\_\_\_\_

Print Name:

\_\_\_\_\_

Date of

Signature:

\_\_\_\_\_



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## Glossary of Terms

<b>we, us or our</b>	Penney, Ruddy & Winter Ltd, company number 8325152, whose registered office is at Becket House, 2 <sup>nd</sup> Floor Mezzanine, 36-37 Old Jewry, London EC2R 8DD. Penney, Ruddy & Winter Limited is authorised and regulated by the Financial Conduct Authority. Our Financial Services Register number is 626355.	<b>identity information</b>	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number
<b>contact information</b>	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address	<b>intermediary services</b>	these are the services we provide to you in relation to the products, which may include: <ul style="list-style-type: none"> <li>• insurance products, investment and pension products, and discretionary investment management services</li> </ul>
<b>data controller</b>	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with <i>intermediary services</i>	<b>lifestyle information</b>	this includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits
<b>data protection regulation</b>	applicable data privacy and protection laws	<b>product</b>	this is an investment, pension and/or protection product in respect of which we provide <i>intermediary services</i> to you
<b>employment status</b>	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance	<b>product provider</b>	a company which provides investment, pension and/or protection products (for a list of product providers which we work with, please contact us – see <i>How to contact us</i> above)
<b>FCA</b>	the Financial Conduct Authority, being the independent watchdog that regulates financial services	<b>sanction check information</b>	this is information relating to your politically exposed persons (PEPs) status and Her Majesty’s Treasury financial sanctions status, which is recorded to prevent fraud and money laundering
<b>financial information</b>	this is information relating to your financial status, including salary/income, outgoings/expenditure, secured and unsecured debt, tax rate and P60	<b>vulnerability</b>	a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/confidence)
<b>health information</b>	this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history		



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