

## Introduction

This notice provides you with 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

In order to provide financial/insurance 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 for the provision of 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 sensitive personal data for which we require individual consent. We do not normally request or process any sensitive personal data.

### *Sensitive 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 for the provision of sensitive data before you provide this information. The subsequent provision of sensitive personal data will be taken as consent to this processing.

It is entirely up to you as to whether or not you choose to provide us with any personal information. If you choose not to, we simply may not be able to assist you.

## Sharing your data

In the course of our work with you we will share your personal data with product and service providers; we may also share you data with compliance monitoring & support organisations and regulatory bodies who are also 'Data Controllers' and registered with a supervisory authority in the EU unless otherwise indicated before we share any of your data.

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

- Secure file sharing
- Data backup
- Dissemination of information
- Other

Otherwise we will not share your personal information with other companies without your express authority except if the firm is sold or where we are required to do so by law.

## Cross border transfer

All our data processing take place within EU jurisdiction. Or Should any processor hold any data on our behalf outside of the EU we will take steps to ensure that it is held in a satisfactory jurisdiction. In the case of the US we will ensure that the EU-US Privacy Shield applies.



### **Marketing**

The information we collect about you is used solely for the purposes for which it was provided. We will never use your data or share it for marketing purposes.

If we have collected information from you for marketing purposes we will inform you and specifically gain your consent.

### **Retention**

We will keep your personal data throughout our business relationship. At the end of any contractual relationship we are required to 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 in order 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 in order to avoid any 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 request for deletion, 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 and with whom it is shared and the processing we undertake and to question any automated decision making processes.

To do this, or if you require more information please contact 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. Contact us for more information.

### **Contact**

For any queries about data protection please contact:

Contact name	Guy Hammett
Address	156 Springfield Road, Chelmsford, Essex, CM2 6LG
Telephone	01245 603870
Web	<a href="https://www.copperhousefinancial.co.uk">https://www.copperhousefinancial.co.uk</a>