



# Privacy Notice

## **Introduction**

Our Privacy Notice explains how we use your personal data, describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulation (GDPR). We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information.

## **How we gather and use personal information**

We need to obtain information about you, so that we can provide the financial advice you require. This information is normally obtained directly from clients in a face to face meeting. It may also be obtained by telephone, post or other means. We may also obtain information from other organisations such as investment / pension / insurance providers, where you have provided authority for them to share information relating to your existing plans or from your professional advisers, where you have provided authority for them to share information. We may also obtain some personal information by making notes of calls or meetings.

We hold such information as Data Controllers in accordance with the requirements of the Data Protection Act 2018 and the EU General Data Protection Regulation, together referred to as the 'Regulations'. We use this information to analyse your current and future financial needs so we can ensure any subsequent advice takes due account of, and is suitable to, your circumstances. We will not share your information with any other party except as indicated in this Privacy Notice or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

## **What information do we collect about you?**

We collect information about you when you engage us for financial planning or other 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 provide feedback to us. Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We'll use your information collected from the website to personalise your repeat visits to the site.

## **Why do we need to collect and use your personal data?**

The primary legal basis we intend to use for the processing of your data is for the performance of, or entry into, our contract with you. The information we collect about you is essential for us to be able to carry out the services you require from us effectively. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations. We may also process data where we have a legitimate interest in doing so as a financial services provider (and where our legitimate interests are not overridden by your (or the relevant individual's) own interests or fundamental rights or freedoms). Where special category data is required, we'll obtain your explicit consent in order to collect and process this information.

## **How will we use the information about you?**

We collect information about you in order to provide you with the services for which you engage us.



# Privacy Notice

## 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 you have the consent of the people concerned to pass their information on to us. We will provide a copy of this Privacy Notice for them or, where appropriate, ask you to pass the privacy information to them.

## Who might we share your information with?

If you agree, we may email you about other products or services we think may be of interest to you. We won't share your information for marketing purposes with other companies. In order to deliver our services to you effectively we may need to send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers we use to arrange financial products for you. The categories of third party are listed below:

- Insurance Providers
- Pension Providers
- Annuity providers
- Investment Providers
- Investment Platforms
- Providers of pension transfer comparison reports
- Compliance Advisers
- Legal Advisers
- Accountants
- Back Office Systems Providers
- Third Party Software Providers
- **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, we will issue communications prior to any such transaction taking place. The new owners may use your personal data in the same way as set out in this notice.

Where third parties are involved in processing your data we will have a contract in place with them to ensure 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's 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.



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## How long do we keep hold of your information?

Your personal data should not be held for longer than is required under the terms of our contract for services with you. We are subject to regulatory requirements to retain data for specified minimum periods. We're also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business
- Three years for mortgage business
- Indefinitely for pension transfers and opt-out business
- Three years for insurance business

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

In addition, we are obliged to treat our customers fairly in the event of a future complaint and therefore reserve the right to retain data for longer than these specified minimum periods in order to allow us to investigate such complaints and, if necessary, defend a future claim against us. We will therefore keep your personal information securely for as long as we need to for the purpose of providing you with financial advice under the terms of our service / fee agreement (contract) or for as long as we are required to by relevant regulations in accordance with our data retention policy. Where we are no longer providing you with services under our service/fee agreement we reserve the right to retain data for longer where we believe it's in our legitimate interests to do so. Where personal information is held that we do not believe is in our legitimate interest we will not keep for longer than 5 years after our relationship with you has ended.

We will regularly review our legal and regulatory obligations and our need to keep your personal information. You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

## How can I access the information you hold about me?

You have the right to request a copy of the information 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 contact details noted below. 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 your personal information is accurate and up to date. Please ask us to correct or remove any information you think is incorrect.

## Marketing

We would like to send you information about our services which may be of interest to you. If you've 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 contact us by email or post at the addresses shown below ("How to contact us").

## Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/> <https://ico.org.uk/for-the-public/online/cookies/>  
You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

## Other websites

Our website contains links to other websites. This Privacy Notice only applies to this website so when you link to other websites you should read their own privacy policies.



# Privacy Notice

## Your Privacy Rights

As outlined above you have several rights under the regulations. For your convenience these are summarised below:

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Access to your personal information:** You can request access to a copy of your personal information. We will not normally charge for providing this information to you.
- **Portability:** You can ask us to provide you or a third party with some of the personal information we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

## 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:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113

## Changes to our privacy policy

We keep our privacy policy under regular review and we will inform you of any updates or changes when they occur. This privacy policy was last updated 18 May 2018.

## How to contact us

Please contact us if you have any questions about our privacy policy or information, we hold about you: by email at: [contact@mcmifa.co.uk](mailto:contact@mcmifa.co.uk) or telephone 01463 718111. Or please write to us at:

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