

SWALLOW FINANCIAL PLANNING PRIVACY POLICY

Swallow Financial Planning is committed to protecting your personal information and ensuring that it is used fairly and responsibly. This Privacy Policy (the Policy) sets out what personal information Swallow Financial Planning will collect about you and how we will use this information.

INTRODUCTION

In this policy “Swallow Financial Planning” and “we” means Swallow Financial Planning LLP, Swallow Financial Investment Management Ltd and Swallow Financial Holdings Ltd.

We gather, use, keep and share (including amongst ourselves) your personal information as described in this Policy.

Swallow Financial Planning LLP and Swallow Financial Investment Management Ltd are Data Controllers registered with the UK Information Commissioner. You can find details of these registrations in the Public Register of Data Controllers on the Information Commissioner’s website at www.ico.gov.uk.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We need to collect information about you to provide you with financial planning advice and our investment management services. This information will relate to your personal and financial circumstances.

The information we gather may also include special categories of sensitive personal data including asking information about your health and medical history and racial or ethnic origin if this is necessary for providing our services to you. We will always ask you for your consent before you provide us with sensitive information.

Generally, we collect information directly from you but we may also obtain information from third parties, such as your employer, your other professional advisers (eg accountant, solicitor), HMRC and credit reference agencies. When you provide us with personal information relating to others, (eg your dependants) you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it in the ways described in this Policy.

WHY WE NEED TO COLLECT AND USE YOUR PERSONAL DATA

The primary basis for which we use your data and data about your family’s circumstances is for the performance of our contract with you. The information we collect about you is essential for us to be able to carry out the services that you require from us effectively. Also, without collecting your personal data we would not be able to fulfil our legal and regulatory obligations.

TO WHOM WE MAY SEND YOUR PERSONAL INFORMATION

We may send your personal information to the following:

- To your nominated email address or Dropbox account.
- To enable us to deliver our services to you effectively we may 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 that we use to arrange financial products for you. We, and any third party specialist advisers to whom we introduce you, may pass your data to organisations when you agree to purchase or amend policies and products.
- To fulfil our obligations in respect of prevention of money laundering and other financial crime we may send your details to credit reference agencies to verify your identity. The reference agency will check the details supplied by you against particulars on any database (public or otherwise) to which they have access. The agency will add a note to your credit file to show that an identity check has been made, but only you will be able to see this. It will not be disclosed to any third parties and it will not affect your credit rating.
- To legal and regulatory authorities or any third party when required to do so. For example, to comply with a court order, or in connection with suspected money laundering or other serious crime, or to respond to any request from either a UK or overseas regulator.
- Your advisers, for example your accountant, tax advisers, solicitor or other specialist advisers.
- To companies who provide a service to us. For example, data processing companies who help us maintain and develop our computer systems.

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 instructions.

HOW WE KEEP YOUR PERSONAL INFORMATION SECURE

We are committed to ensure that your personal information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to keep it safe and secure. This includes a variety of electronic security measures such as passwords, firewalls and data encryption techniques.

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 instructions. Sometimes a product or service may be administered from a country outside Europe. If this is the case, the firm must put a contract in place to ensure that your information is adequately protected.

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.

THE PERIOD OF TIME WE WILL HOLD YOUR PERSONAL INFORMATION

We will hold your personal information after you have cancelled our services for as long as permitted for regulatory, legal, fraud and other financial crime prevention purposes.

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.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You have a right to request a copy of the personal information we hold about you. If you would like a copy of some or all of your personal information please write to us at the address given at the end of this document. We will provide you with the personal information you have requested within one month from date of request. We do not charge for this service.

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 make sure your personal information is accurate and up to date. You may ask us to remove, update or correct any information you think is inaccurate.

CLIENT MARKETING

If you agree, we may wish to contact you by telephone, email, text or post about other products or services that we think may be of interest to you. We do not share your information for marketing purposes with other companies.

If you have agreed that we can contact you for marketing purposes you can change your mind easily by contacting us by email or post as detailed at the end of this policy.

COOKIES

Information relating to the use of our website is collected using cookies. These are small text files placed on your computer to collect standard internet log information and visitor behaviour.

We use cookies to track use of our website and to compile statistical reports on website activity. You can manage cookies by setting your browser to control which cookies are saved or by deleting them, if you wish. Our Cookies Policy provides additional information about the cookies we use.

To find out more about cookies, including how they can be controlled and deleted visit the following websites: <http://www.allaboutcookies.org> and <http://www.aboutcookies.org>.

OTHER WEBSITES

This Policy does not cover any third party links on our website that link to other websites. We encourage you to read the privacy statements on the other websites you visit.

WHAT TO DO IF YOU ARE UNHAPPY WITH HOW YOUR DATA IS PROCESSED

You have the 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

Telephone 0303 123 1113 (local rate)

CHANGES TO OUR POLICY

We keep our Policy under regular review and we will place any updates on our website. You may also contact us for an up to date version.

HOW TO CONTACT US

If you have any questions about our Policy or information we hold about you please contact us at the following:

Data Protection Officer
Swallow Financial Planning LLP
25 St Helen's Street
Ipswich
IP4 1HH

Telephone: 01473 384858

Email: contact@swallow-financial.co.uk