

## **Financial Services - Privacy Notice**



Alan Boswell Financial Planners is the trading style of Alan Boswell & Company Ltd. This document also applies to Alan Boswell Employee Benefits Ltd, which is an Appointed Representative of Alan Boswell & Company Ltd.

This privacy notice explains how we use any personal information we collect about you.

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

We collect information about you when you engage us for financial planning 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.

### **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.

### **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'd 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. Where the information has been provided by your employer, we are processing this on the basis that your employer has your consent to provide us with it.

Where we are contacting you about other products or services that we think may be of interest to you, the processing is necessary for our legitimate interest. You can opt out of this at any time.

### **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.

### **Who might we share your information with?**

We will share your information with our group of companies to deliver our services to you effectively and for the performance of our contract with you. We may contact you about other products or services that we think may be of interest to you. We won't share your information for marketing purposes with companies outside our group of companies/other companies. You can opt out of this at any time.

In order 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.

Where third parties are involved in processing your data we will 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'll only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party we'll 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. We currently use TransUnion and their privacy notice is at this address - [www.callcredit.co.uk/legal-information/bureau-privacy-notice](http://www.callcredit.co.uk/legal-information/bureau-privacy-notice) .

## 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, including five years for investment business and indefinitely for pension transfer and opt-out business. These are minimum periods, during which we have a legal obligation to retain your records. We reserve the right to retain data for longer where we believe it is necessary to do so.

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 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 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 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

Occasionally we would like to send you information about our products and services and those of other companies in our group which may be of interest to you.

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.

## Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information please visit [www.alanboswell.com/privacy](http://www.alanboswell.com/privacy).

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.

## 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 (local rate)

## Changes to our privacy policy

We keep our privacy policy under regular review and we will ensure the latest version is on our website – [www.alanboswell.com/privacy](http://www.alanboswell.com/privacy). This privacy policy was last updated on 23/05/2018.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

**Email (general):** [ifa@alanboswell.com](mailto:ifa@alanboswell.com)

**Email (opting out of marketing):** [optout@alanboswell.com](mailto:optout@alanboswell.com)

**Post:** Cedar House, 105 Carrow Road, Norwich, Norfolk, NR1 1HP