



## PRIVACY POLICY

### Introduction

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

Lloyd & Co Financial Planning Ltd 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.

Lloyd & Co Financial Planning Ltd are a company registered in England and Wales 07096647. Lloyd & Co Financial Planning Ltd whose registered office is at 15 Hoghton Street, Southport, PR9 0NS. Lloyd & Co Financial Planning Ltd is authorised and regulated by the Financial Conduct Authority. Lloyd & Co Financial Planning Ltd Financial Services Register number is 548625.

We provide you with independent financial advice and protection services.

### The personal data we collect and use

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

- Full Name
- Address
- Company Name
- Contact Email
- Contact phone number

- Date of Birth
- Health and lifestyle Information
- Finance & Banking Information
- Employment status
- Contact history
- Product Details
- Details on any vulnerability
- Details of dependants or beneficiaries under a policy (if you are providing information about another person you should ensure that you have their consent to provide their details)

### Information collected from other sources

We also obtain personal data from other sources in the course of providing our *advice 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 Insurers
  - product details
- From identification and verification checking agencies:
  - identity information
  - sanction check information

### 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



Reason for processing	Lawful Basis
Arranging and administering investments and protection policies	Necessary for the performance of the contract
Provision of information on products and services (Including through online promotions, advertisements and email marketing)	Legitimate interest or your explicit consent
To notify you of changes in our service	Our Legal and Regulatory obligations
To prevent and detect fraud, money laundering and other financial crimes	Our Legal and Regulatory obligations
To meet general legal or regulatory obligations	Our Legal and Regulatory obligations
Statistical Analysis	Legitimate interests – to refine and enhance the products and pricing which we can offer
Historical information	Our Legal and Regulatory obligations and legitimate interest - to provide you with excellent customer service and provide staff training.
Referral to services within the Lloyd & Co group	Legitimate interest or your explicit consent

### 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 advice services in relation to a protection insurance products.
- criminal conviction or offence information when providing *advice services* in relation to a product or service.

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

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

### Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products



and services from *us* that may be of interest to you. *We* will only do so where we have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to *us*.

In addition, where you provided your consent, *we* may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact *us*:

By phone: 01704 443107

By email: [info@lloydfp.co.uk](mailto:info@lloydfp.co.uk)

By Post: 15 Hoghton Street, Southport, PR9 0NS

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every email.

#### **Whether information has to 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 in order for *us* to provide you with our services.

#### **How long your personal data will be kept**

*We* will hold your personal data for differing periods of time depending upon the reason *we* have for processing it. *We* have established data retention timelines for all of the personal information that *we* hold based on why *we* need the information. The timelines take into account any statutory or regulatory obligations *we* have to keep the information, our ability to defend legal claims, our legitimate business interests, best practice and our current technical capabilities.

Your data will not be retained for longer than is necessary and will be managed in accordance with our data retention policy. In most cases the period will be for a minimum of 7 years following the end of an insurance contract or investment. *We* do have the right to retain

information for a longer period due to business, legal or regulatory requirements. For Pension Transfer advice the information would be held indefinitely.

#### **Transfer of your information out of the EEA**

*We* will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have a right to ask *us* for more information about the safeguards *we* have put in place as mentioned above. To learn more, please see 'Your rights' below.

#### **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 object to automated decisions
- 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. 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.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order 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 on the basis of 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 in order 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.

#### ***To contest decisions based on automatic decision making***

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not



apply where *we* are authorised by law to make such decisions and have adopted suitable safeguards in *our* decision making processes to protect your rights and freedoms.

### ***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, where *we* got your data from and whether *we* have carried out any automated decision making using your personal data.

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

- email or write to our Data Protection Officer David Lloyd at david@lloydfp.co.uk or 15 Hoghton Street, Southport, PR9 0NS.
- 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 David Lloyd 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 david@lloydfp.co.uk or write to 15 Hoghton Street, Southport, PR9 0NS.



## Glossary of Terms

<b>we, us or our</b>	Lloyd & Co Financial Planning A company registered in (England and Wales) (Scotland) (company number 07096647) and having its registered office at 15 Houghton Street, Southport, PR9 0NS	<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>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>product</b>	This is a Protection product in respect of which we provide <i>advice services</i> to you
<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>advice services</i>	<b>product provider</b>	a company which provides investment, pension and protection products (for a list of product providers which we work with, please contact us – see <i>How to contact us</i> above)
<b>data protection regulation</b>	applicable data privacy and protection laws	<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>employment status</b>	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance	<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>FCA</b>	the Financial Conduct Authority, being the independent watchdog that regulates financial services		
<b>financial information</b>	this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60		
<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		
<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>Advice services</b>	these are the advice services we provide to you in relation to the products, which may include: <ul style="list-style-type: none"><li>• Investments</li></ul>		