

## Privacy Policy and Cookies

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### What information we collect if you ask us for advice

We try not to ask you for personal information that we do not need. The personal information we do collect about you will vary depending on the product or service you want and whether you have previously been advised by us.

What personal information we may collect	Examples	When do we collect it
Personal details	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Place of birth</li> <li>• Address and postcode</li> <li>• Email address</li> <li>• Phone number</li> </ul>	During the advice process
Proof of identity	<ul style="list-style-type: none"> <li>• Utility bill</li> <li>• Driving licence</li> </ul>	During the advice process
Financial information	<ul style="list-style-type: none"> <li>• Income</li> <li>• Bank details</li> </ul>	During the advice process

### How we use your information

There are many reasons why we may use your information, from replying to a request for advice, to carrying out regulatory duties to prevent money laundering. How we use your personal information will again depend on the service and whether you have previously taken advice from us.

How we use your personal information	Examples
To provide advice	<ul style="list-style-type: none"> <li>• Assessing and processing an application</li> <li>• Responding to your enquiries</li> </ul>

	<ul style="list-style-type: none"> <li>• Managing our relationship with you (for example, a change of address)</li> </ul>
Meet legal and regulatory obligations	<ul style="list-style-type: none"> <li>• Obligations we have in relation to the prevention and detection of crime</li> <li>• Regulatory reporting</li> </ul>

## Legal basis for using your information

We will only collect, use and share your information where we have a valid reason to do so under data protection legislation. We have 4 main reasons for using your information:

1. Contract – we may need to process your information to fulfil contractual obligations, or to respond to a request for information before entering into a contract (for example, providing an illustration).
2. Legal obligation – we may need certain information from you to meet our legal and regulatory obligations; for example, proof of identity to protect against fraud.
3. Our business interests – we may use your information to meet our legitimate business interests. When we process personal information to meet our legitimate business interests we put in place safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or rights and freedoms.
4. Consent – there may be occasions where we need to obtain your consent to receive future information from us. If we ask for your consent to process your personal information, you have the right to withdraw your consent at any time.

## How long do we keep your information?

We will keep your information for as long as we have business dealings with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under the law and regulation
- Defend or bring any existing or potential legal claims
- Deal with any complaints regarding our products or services

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.