

# Privacy Policy



## Who are Finance Planning Wealth Management?

At Finance Planning Wealth Management Limited (“we” “us” “our”) we have one goal in mind – to give you the financial advice you need and complete peace of mind that your finances are in the best possible place to match your individual circumstances both now and in the future.

We do this by providing expert financial advice and building a financial plan which is tailored to fit your circumstances, focusing on your needs today, future goals and aspirations.

Our advice covers the full range of financial areas, including retirement planning, protection and insurance, building an effective investment portfolio, long-term care planning, and mortgages to name just a few. We can provide a full holistic advice service or simply help you with just part of your financial planning – the choice is yours.

We are a limited company registered in England and Wales, Registration number 09335256.

We are an appointed representative of TenetConnect Limited, which is authorised and regulated by the Financial Conduct Authority. TenetConnect is entered on the FCA Register under reference 149826

You can contact us at: Hurstwood Grange, Hurstwood Lane, Haywards Heath, West Sussex, RH17 7QX. Tel : 01444 449200 or email : [info@financeplanning.co.uk](mailto:info@financeplanning.co.uk)

## What ‘legal basis’ will you process my personal information?

Before we go any further, by process we mean look after and store. The law on data protection sets out a number of different reasons for which a company may collect and process personal information.

### Contractual

We process your personal information to act on your behalf for the purpose of arranging and advising on the following:

- Investments & Pensions, for example an ISA or Personal Pension Plan;
- Personal & Family Protection, for example a Life Assurance or Critical Illness Plan;
- Mortgages, including Buy-to Let;
- Releasing equity from your home (Equity Release);
- General Insurance, for example Buildings & Contents or Accident, Sickness & Unemployment.

We would be unable to provide you with this advice or arrange any of the above without this information.

### Legitimate interest

We will process your personal information under this condition where our interest in using it is not outweighed by your privacy rights or interests. This means that we can use your personal information only in ways you would reasonably expect and which have a minimal impact on your privacy, or where there is a compelling justification for the processing.

When it comes to staying in touch, we rely on legitimate interests because we only contact existing customers or people who have contacted us directly who are expecting us to do so. Each communication provides an easy to use opt-out.

### Legal compliance

We may need to process your data in order to fulfil our legal obligations as a regulated business. For example we may need to verify your identity and comply with anti-money laundering legislation, and co-operate with law enforcement, legal proceedings or regulatory authorities.

## What information do you collect?

There are a number of categories of data including Identity Data, Contact Data, Financial Data, Special Category Data (specifically medical history) and Profile and Usage Data.

### Investment, Pension and Protection Customers

We routinely offer our customers a range of Investment and protection solutions. We will collect details such as name, address, email address, contact number, date of birth, national insurance number and financial information to provide our services. Where customers express an interest in protection, we will also collect information about health, as may be necessary for the insurers to determine the level of cover and premiums.

### Mortgage Customers

This involves sourcing the market to find the mortgage that best suits your circumstances. We do this by asking you about your identity and contact details; your product preferences; your property and tenancy history and types and number of occupants and their relationship to you; your lifestyle; nationality and residence status; employment, income and

expenditure and other financial circumstances. How you answer these questions will determine what other questions we ask you, because different lenders serve different parts of the market and have different eligibility criteria. We will always explain the process to you and answer any questions you may have about why certain types of information may be needed.

When you apply for a mortgage through us we will collect your direct debit details to pass on to your lender. If the products you select involve a cost, such as a valuation fee, we will ask for your payment information.

Mortgage providers are data controllers in their own right and have their own privacy notices. However, because lenders may automatically profile your information against their lending criteria and against credit reference agencies as soon as your information is forwarded to them this may affect your credit score. We will always bring this to your attention as part of the process so that you are forewarned.

## How will you use my personal information?

As your Adviser, we use your personal information to discuss your personal circumstances with lenders and providers, in order to determine the most appropriate product for your needs. A lender may then undertake credit enquiries upon receipt of your mortgage application. There may be instances where your identity and address is also checked using electronic verification providers.

We may use your personal data to provide you with details about our services, products, business updates and events which we think may be of interest. You have the right to opt-out of receiving the information at any time. To opt-out of receiving such information you can click the unsubscribe button contained in any such communication received or email us at [info@financeplanning.co.uk](mailto:info@financeplanning.co.uk) or call 01444 449 200 providing us with your name and contact details.

Where you have subscribed to receive marketing correspondence from us we will keep your personal data for six years from when you subscribed to receiving marketing information from us or until you unsubscribe from receiving such correspondence from us (whichever is earlier).

## Who do we share your personal information with?

We disclose personal information to third parties such as lenders, insurers and other financial services providers, but only to a level that is necessary to conclude the relevant contract or product purchase and the ongoing servicing of these contracts. A list of the type of firms this might include is:

- A product provider, fund manager, and platform provider, to process your investment or pension application
- A lender, to process your mortgage application
- A solicitor or conveyancer, to help process your mortgage application
- An estate agent or home builder, to provide updates to help process your mortgage application
- An insurer, to process your protection application
- A third party para-planner, to help prepare the advice
- A packager, to help process your mortgage application
- A secured loan master broker, if it is felt that a second charge mortgage is more appropriate for your needs

In addition we may disclose your personal data to third parties for the following legitimate business purposes including

- Sharing personal data with Tenet\* as they are responsible for the services we provide to our clients and have a legal obligation to monitor our compliance with the FSMA and Financial Conduct Authority rules. Further details regarding how Tenet will use customer personal data can be found on it's website at [www.tenetgroup.co.uk](http://www.tenetgroup.co.uk) or by contacting Tenet on 01132390011
- Staff members in order to facilitate the provision of services to you
- IT software providers that host our website and store data on our behalf
- Marketing company to provide you with details about our services, products, business updates and events which we think may be of interest, and
- To a prospective buyer of some or all of our business or assets, in which case personal data including your data will also be one of the transferred assets.

Also, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations. For instance, to meet our obligations to the Financial Conduct Authority and when responding to subject access requests, proceedings of a court of law or similar legal process, to protect against fraud, and to otherwise cooperate with law enforcement or regulatory authorities. This includes exchanging information with other companies and organisations for the purpose of fraud and credit risk reduction.

We will **not** sell or distribute your personal data to other organisations without your approval.

\*Tenet means Tenet Group Limited, Tenet Limited, TenetConnect Limited, TenetConnect Services Limited, TenetLime Limited, its associated companies.

## How do you collect my personal information?

Personal data is collected by us using the following methods:

- Direct interactions with an adviser in person, by post, phone, email or otherwise when sourcing and applying for mortgage, protection, investment and pension products.
- Automated technologies or interactions with our website, by using the web enquiry form or the quick quote application, QuickStart™.
- Third parties or publicly available sources, such as: Estate agents with whom you may be interacting, but only with your consent.
- New home builders, as a legitimate interest of the builder in order to assess affordability for the property.

## How do we keep your personal information secure?

We understand how important it is to keep your personal information secure. We use a variety of technologies and procedures to protect your personal information from accidental or unlawful breaches of security. These include physical, organisational, and technological security measures.

We also limit access to your personal data to only those Finance Planning staff, appointed representatives, advisers, business partners and suppliers who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## How long will you store my information for?

We only retain your personal data for as long as necessary. The list below outlines how long data is retained, and depends on the reason the personal data is used for:

### Purpose of processing

Full application, where product goes into force  
Failed applications, where the product does not proceed  
Enquiries from third parties i.e. an estate agent  
Affordability assessments i.e. property offer validation  
Regulated Investment and Pension advice

### Period

Contract term plus six years  
2 years  
2 years  
2 years  
80 years

## What are my rights?

Here is an overview of your different rights

### Your right to access

Access to the personal data we hold about you, free of charge in most cases. The correction of your personal data when incorrect, out of date, or incomplete.

### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### Right to object

You will have the right to object to how we intend to use your information based on your individual circumstances. If you exercise this right, we may not be able to perform all of our services.

You have an absolute right to object to receiving communications where we do not have a legitimate interest in doing so. For example; you can ask us to stop sending you a quarterly newsletters but we may have a legitimate interest in contacting you during the application process.

### Right to complain

You have a right of complaint to the Information Commissioner (The U.K data protection regulatory authority) if you consider any aspect of Finance Planning Wealth Managements use of your personal information infringes the law.

### Right to data portability

You have the right in some circumstances to have the data you have provided to us sent to you or provided to another person or business in an electronic machine readable format. Where this applies we will download the information and send it as a CSV file.

### Right to erasure

You have a right to have some or all of the information we hold about you erased in some circumstances. This is known as the right to be forgotten.

### Right of correction

You have the right to have inaccurate information corrected and incomplete information completed. If the information we need to deliver our services to you changes, please tell us about this as soon as possible.

## Who can I speak to about my personal information?

If you have any questions or concerns about the way in which we are processing your personal information or would like to exercise one of your earlier mentioned rights, in the first instance please contact our Privacy Officer.

Finance Planning Wealth Management, Hurstwood Grange, Hurstwood Lane, Haywards Heath, West Sussex, RH17 7QX.

By Phone 01444 449 200

By email [privacyofficer@financeplanning.co.uk](mailto:privacyofficer@financeplanning.co.uk)

If you would like to update your privacy settings or exercise any of your above rights, you may do so online at [financeplanning.co.uk/privacy-settings](https://financeplanning.co.uk/privacy-settings).

## What about when things go wrong?

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113, or go online to [ico.org.uk/concerns](https://ico.org.uk/concerns).

## Will this policy change?

Yes, we may change this Privacy Policy from time to time, for example if the law changes. Any changes will be immediately posted on [financeplanningwealth.co.uk](https://financeplanningwealth.co.uk) and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated 22nd May 2018.

