

Customer Privacy Notice

Why should you read this document? - When you work with us, we will ask you personal information relating to your existing circumstances, financial situation and health (**Your Personal Data**). This document allows us to explain what we need to do with Your Personal Data, and the various rights you have in relation to it.

What do we mean by “Your Personal Data”? - Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, National Insurance number. It may also identify you indirectly, for example, your employment situation, health history, or any other information that could be associated with your cultural or social identity.

When providing Financial Planning advice Your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details and documents that verify your identity.
- Employment and remuneration information.
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents.
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically about the processing we may undertake in relation to this type of information).
- Any existing investment or insurance plans and the terms and conditions relating to these.

The basis upon which our Firm will deal with Your Personal Data - When we provide Financial Planning advice both parties are entering a contract for the supply of services. To perform that contract, and to set up the plans required we have the right to use Your Personal Data for the purposes detailed below.

When we provide Financial Planning advice or when our Financial Planning agreement ceases, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. We may need to provide details to our regulator about the advice we provided you.

We will use Your Personal data for the contractual responsibilities we owe our regulator The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data to meet a legal, compliance or regulatory obligation to which we are subject.

The basis upon which we will process certain parts of Your Personal Data - Where we advise you on life insurance and insurance that may assist you in the event of an accident or illness, we will ask for information about your ethnic origin, health and medical history (**Your Special Data**). We will record and use Your Special Data to make enquiries of insurance providers in relation to plans that may meet your needs and to provide you with advice regarding their suitability.

If you have parental responsibility for children under the age of 13, it is also very likely we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together “**Criminal Disclosures**”). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

How do we collect Your Personal Data? - We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during our initial meetings or conversations to establish your circumstances, needs and preferences in relation to investment and insurance. You will provide information to us verbally and in writing, including email.

What happens to Your Personal Data when it is disclosed to us? – When handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and computer systems (*email, hard drives, and cloud facilities*). This information can only be accessed by employees within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit Your Personal Data to Providers both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

Sharing Your Personal Data - From time to time Your Personal Data will be shared with:

- Investment Providers and insurance providers.
- Third parties who we believe can assist us with your enquiry or support your needs as identified. These may include our compliance professional, product technical specialists, or solicitors.

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your investment or insurance enquiry and to provide you with our professional services.

Note: This sharing of Your Personal Data does not entitle third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

Security and retention of Your Personal Data - Your privacy is important and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years and normally indefinitely.

Your rights in relation to Your Personal Data - You can:

- request copies of Your Personal Data that is under our control.
- ask us to further explain how we use Your Personal Data.
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request).
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish.
- change the basis of any consent including withdrawing consent.

How to make contact with Moneo in relation to the use of Your Personal Data - If you have any questions or you wish to exercise any of your rights set out within this notice please contact Ken Simmonds.

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.