IFA Professional Planning Ltd Limited Privacy Notice

IFA Professional Planning Ltd is committed to respecting and protecting your privacy. Please take the time to read this privacy notice, which contains important information about the way in which we collect, store and process any personal data you provide to us. This privacy notice may change from time to time and, if it does, the up-to-date version will always be available on our website and becomes effective immediately.

Who we are

IFA Professional Planning Ltd is a company registered in England under number 04604628
Our registered office is at Partnership House, 40-42 Beverley Road, Kingston upon Hull, HU3 1YE.
We are an appointed representative of The Insurance Partnership Financial Services Ltd which is authorised and regulated by the Financial Conduct Authority under Financial Services Register number 232445.
Our ICO registration number is Z7898925

The personal data we will collect and use.

When you supply any personal information (data) to us, we hold that data as data controller for the purposes of data protection regulations. Under these regulations, we have legal obligations towards you in the way we use this data. We must collect the information fairly, that is, we must explain how we will use it and tell you if we want to pass the information on to anyone.

Personal data is any information relating to an individual. In the course of providing our advice services to you we need to collect personal information from you in order for us to provide you with appropriate financial advice. The amount of information we may collect will depend upon the type of financial advice being given but could include:

- contact information
- identity information
- financial information
- employment status
- details of any vulnerability*
- details of your partner, dependents and/or beneficiaries under a policy

* a vulnerable client 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 clients 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)

Please Note: if you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us.

How do we collect your personal data?

The information that we hold may be supplied by you directly to us in many ways; by telephone, face to face meeting, e-mail or other correspondence or via our client portal.

How we use your personal data?

Primarily, as financial advisers we process your personal data because **it is necessary for the performance of, or entry into, a contract with you** to provide financial advice and complete transactions on your behalf. We would not be able to provide any services to you without this personal data.

We also require your personal data in order **to comply with legal, professional and regulatory obligations** which apply to us in giving financial advice.

Special Category Data
In some instances, we may need to obtain information which is classed as special category data. This type of data is considered more sensitive and is subject to additional levels of protection under data legislation. Special category data includes health details, 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 need to process special category data when we are **advising, arranging or administering** on products such as mortgages, protection policies and annuities or for **the establishment, exercise or defence of legal claims.** We may process criminal conviction or offence information in the course of our activities relating to the prevention, detection and investigation of financial crime. Where we do so, in addition to the lawful basis for processing this information above we will be processing it for the **purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty**. We will also obtain your consent to process special category of data via our Specific Consent Details and Client Declaration Form which is attached to this privacy notice.

Data collected from other sources
We may also obtain personal data from other sources in the course of providing our services to you. The personal data we obtain from other sources may include product details from providers and/or lenders. We may also check your details with identification and verification checking agencies which is recorded to prevent fraud and money laundering. Where we obtain 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.

Keeping your data secure
The information we hold will be stored on computer via our Client Management System. Initially some records may be stored in paper format but this will then be transferred onto our Client Management System. Copies of any proposal forms, instructions and other documentation will also be held on file. We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. All personal information supplied is held securely, in accordance with the data protection legislation. 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 breach where we are legally required to do so.

The period for which we will keep your data
We may keep your data for up to 10 years after you stop being a client. The reasons we do this are in case we need to respond to a question or complaint or to comply with regulatory requirements on keeping records. We may need to keep your data longer than 10 years after you stop being a client to comply with legal, regulatory or technical reasons. This may be to meet the record requirements of our regulator the FCA but also to enable us to us to investigate any future complaints or claims. For example, we have to retain pension transfer information indefinitely. We will only use your data for those purposes and will continue to protect your privacy. We review our retention policy and our reasons to continue to process data annually. In any event we will not store your information for longer than is reasonably necessary or required by law.

The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you.

Sharing your personal data
We may need to share your personal information with third parties in order to provide you with appropriate advice and/or for the purposes of administering and arranging financial products on your behalf. These may include software service providers, insurance companies, mortgage or equity release providers, support services and organisations to enable us to fulfil our contractual obligations to you and/or our clients in the course of business. We may also be required to share your data with our regulator (FCA) and other third parties including auditors or insurers. If we do share your information with third parties they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal data. We will only share your personal data in compliance with the European Data Protection Legislation.

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 obtained your consent in accordance with any marketing preferences you have provided to us. You can opt out of receiving marketing or amend your marketing preferences at

any time by writing to us. If you do consent to us contacting you, we will always aim to be respectful, relevant and appropriate. If at any time you do not think that we have complied with this, please contact us straight away to let us know.

Sending your data outside 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.

Accessing personal data
You can ask to get a copy of your personal data from us. To obtain a copy of the personal information we hold on you please write to: The Compliance Director at IFA Professional Planning Ltd, Partnership House, 40-42 Beverley Road, Kingston upon Hull, HU3 1YE or e-mail: kspark@tipfs.co.uk. We aim to respond to such requests within the 28 day timescale. Please note: For any access request made after 25 May 2018 that is deemed excessive or especially repetitive, we may charge a 'reasonable fee' for meeting that request. Similarly, we may charge a reasonable fee to comply with requests for further copies of the same information. (That fee will be based upon the administrative costs of providing the information).

Changing or erasing your data:
You can ask us to correct any inaccurate information we hold. We will be happy to rectify such information but would need to verify the accuracy of the information first. You can also ask that we erase your personal data by contacting us if you think we no longer need to use it for the purposes we collected it from you. We may not be able to comply with your request, for example when we need to keep using your data in order to comply with our legal obligations or where we need to use your personal data to establish, exercise or defend legal claims.

Requesting 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.

Additional information regarding our website
Our website may, from time to time, contain links to and from the websites of advertisers and partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Our website does not automatically capture or store personal information, other than logging the user's IP address and session information such as the duration of the visit and the type of browser used. This is recognised by the web server and is only used for system administration and to provide statistics. Links to other websites do not imply any endorsement, validation or responsibility by IFA Professional Planning Ltd as to the content or privacy policies of such sites. We cannot guarantee that these links will work all of the time and we have no control over the availability of the linked pages.

Reporting a problem with our website: Should you report an issue on the website, we act upon the report but we do not store your information. **If you contact us**, we may keep a record of that correspondence but you may ask to be unsubscribed at any time by contacting our Compliance Director.

Complaints
In the unlikely event that you have a complaint about the way in which your details are used or stored by this company, please contact:

The Compliance Director, IFA Professional Planning Ltd, Partnership House, 40-42 Beverley Road, Kingston upon Hull, HU3 1YE.

E-mail: kspark@tipfs.co.uk

You also have the right to make a complaint to the Information Commissioner's Office. For more details please visit the ICO website at https://ico.org.uk/. We would ask that you please attempt to resolve any issues with us before the ICO.

Next Steps

In order for us to process your information, we would ask that you tell us of your preferences by completing the attached Specific Consent Declaration Form. If you have any questions about this privacy notice or the information we hold about you then please contact us.

Specific Consent Details & Declaration regarding Personal Data

Consent Details	Client 1	Client 2
I/ We hereby give my consent for you to process my/our personal data and to share it with other companies for the express purpose of advising, arranging and administration of financial products	Yes ☐ No ☐	Yes ☐ No ☐
I / We are aware of my/our rights under the data protection act and confirm my/ our express consent to be contacted in relation to my/our financial requirements and the ongoing servicing of these.	Yes ☐ No ☐	Yes ☐ No ☐
For mortgage products, I hereby give my/our consent for you to contact me at the end of my mortgage deal to discuss my ongoing requirements	Yes ☐ No ☐	Yes ☐ No ☐
I hereby give my/our consent for you to process special category data including my/our health details / lifestyle information for the purpose of advising, arranging and administration of protection and annuity products	Yes ☐ No ☐	Yes ☐ No ☐
I/We confirm I / we are the parents / guardian of the children and hereby give my/our consent for you to process information relating to them for the purpose of advising, arranging and administration of financial products	Yes ☐ No ☐	Yes ☐ No ☐
Marketing	**Client 1**	**Client 2**
Do you wish to be contacted for marketing purposes?	Yes ☐ No ☐	Yes ☐ No ☐
Please contact me by phone for marketing purposes	Yes ☐ No ☐	Yes ☐ No ☐
Please send me marketing information by mail	Yes ☐ No ☐	Yes ☐ No ☐
Please send me marketing information by e-mail	Yes ☐ No ☐	Yes ☐ No ☐
Please send me marketing information by SMS text, picture messaging or by any other personal means of contact apart from mail, telephone or email	Yes ☐ No ☐	Yes ☐ No ☐
Please send me marketing information or contact me through Social Media	Yes ☐ No ☐	Yes ☐ No ☐
Accessible format requirement	Large Print ☐ Audio Tape ☐ Braille ☐ No Requirement ☐	Large Print ☐ Audio Tape ☐ Braille ☐ No Requirement ☐
Preferred delivery method	Electronic ☐ Post ☐ No Preference ☐	Electronic ☐ Post ☐ No Preference ☐

I/We (the undersigned) have read the privacy notice and consent to the uses, processing (as defined under General Data Protection Regulations) disclosures and transfers of information as described in it. I am aware that I/we have the right of access to information that the company holds on me/us.
I/We understand that IFA Professional Planning Ltd may also check my details with one or more fraud prevention agencies and that if any information I/We have provided is false or inaccurate and IFA Professional Planning Ltd suspects fraud, it will keep a record of this. I/We am aware that these organisations may keep a record of the search and record details of my/our application. The agencies may also allow other organisations to use these records when assessing applications for credit, or for other services, for example, tracing and recovering debts, preventing fraud and for identification purposes.

	Client 1	**Client 2**
Signed		
Print Name		
Date		