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# **Data Protection: Keeping your information confidential**

**Why we need information about you**

**The purpose of this notice:**

When we provide you with financial advice, we want to make sure that what we recommend really does meet with your requirements. In order to do that we need information about you – and much of what you tell us will be confidential information, hence this Data Protection Notice.

**The purpose of this notice**

As part of our arrangement with you, Charterhall Associates Ltd has certain obligations under privacy laws, including the Data Protection Act (the “**Act**”), to notify individuals how it will process any personal information it collects about them. This Notice informs you of what personal information we collect, how that information is used, where it is transferred, and how you may view and amend such information. We will treat all personal information as confidential and will not process it other than for a legitimate purpose. We will take steps to ensure that the information is accurate, kept up to date and not kept for longer than is necessary. We will also take measures to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to the information.

**What type of personal information will be processed?**

We collect and process personal information about you (personal data) for the purposes of providing advice, administration and management services. These are explained in more

detail below.

**“Processing”** is defined in the Act but could include obtaining, recording or holding information or data.

**“Personal data”** is information which can identify you as a living individual, including where used in conjunction with other information.

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Common examples of personal data which may be collected and used by us in our day to day business activities include:

* Name
* date of birth
* gender
* marital status
* address
* telephone number(s)
* other contact details (including email addresses)
* job title
* Bank account and other financial details.

Depending upon the types of products and services you require, the information collected and processed may also contain **“sensitive personal data”** for the purposes of the Act.

That includes information held by us regarding:

* your physical or mental health or condition
* the commission or alleged commission of any offence by you
* any proceedings for an offence committed or alleged to have been committed by you, including the outcome or sentence in such proceedings
* your sexual life
* in limited circumstances, your membership of a Trade Union
* your political opinions, religious or similar beliefs

Any information that we receive fairly and lawfully relating to one of the above categories constitutes sensitive personal data. Examples of likely items which may contain sensitive personal data (although this is not an exhaustive list) are life insurance questionnaires, medical reports and Statutory Sick Pay (SSP) self-certification forms.

Please note that as with personal data, you have freedom of choice when it comes to your decision as to whether you provide us sensitive personal data. In addition to your right to request that we stop processing your personal data and sensitive personal data at any time, you have an opportunity at the end of this Notice to choose not to provide sensitive personal data to us at all.

**You should however note that if you exercise this right or subsequently request that we stop processing all or part of your personal data and/or sensitive personal data, this could impact upon our ability to provide you with certain types of product and services. It may ultimately result in us being unable to provide them to you at all.**

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**How will my personal data be collected and used?**

We collect personal data from you to the extent necessary to provide advice, administrative and management services and (subject to the provisions below), related marketing activities.

We may process your personal data and sensitive personal data for the following reasons:

* The administration, management and provision of advice in relation to financial services products
* Our legitimate business processes and activities including internal audit, accounting, business planning and proposed and actual transactions (including joint ventures and disposals of business) and
* Compliance with legal (including dealing with claims), regulatory and other good governance obligations
* This list is not exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal data that we maintain will be kept in paper files, while other personal data will be included in computerised files and electronic
* databases.

**Who might my personal data be shared with?**

Your personal data will be made available for the purposes mentioned above and only to responsible management, human resources, accounting, audit, compliance, information technology and other corporate staff. It may also be made available to third parties providing relevant services to us, such as Paradigm Partners LLP, who provide us with certain support services including regulatory support, Intelliflo which are our chosen back office system, which provide a facility to store client information and reconcile our trading income, Spider Oak One Data Back Up and PPOL Ltd who provide us with certain support services including report writing software.

Certain personal data will also be reported to government authorities where required by law and for tax or other purposes. Personal data may also be released to external parties as required by legislation, or by legal process, as well as to companies you authorise us to release your personal data to. We will not sell your personal data to any third party.

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We may wish to provide you with information about new products, services, promotions, and other information in which we think you may be interested. We may send you such information by postal mail, fax or telephone, unless you have registered with the appropriate Preference Service. If you do register with such a service we would be grateful if you could let us know.

If you purchase a product from us we may retain your address for future mailings. If you do not want your information used for direct marketing purposes at any time, please contact our customer services department by e-mail at chris@charterhallassociates.com or by telephone on 01932 254032 to let us know and we will not send you any direct marketing.

**Email marketing**

We would also like to provide you with the above information by email. However, we appreciate that email “spam” has become a problem in recent years. If you are a customer or you have previously asked us for information on our products:

* We may contact you regarding your purchase or other matters regarding transactions between us, or your customer relationship with us, or send you information on our products by e-mail, unless you have asked us not to do so, and
* We may also use your email address to send you information about our products and services that we think may be of interest to you, unless you have asked us not to do so by email.

**A consent tick box is provided at the end of this form for you to indicate your preference to receive email marketing. If you decide at any time that you no longer wish to receive marketing emails from us, please email us at chris@charterhallassociates.com**

**Your right to review and amend personal data**

You have the right to review your personal data and sensitive personal data held by us and have any inaccurate information about you corrected. If you wish to do so, or to notify a change in your details, please contact The Data Protection Officer Christopher Lock on Tel No 01932 254032. You may be charged a fee (subject to the statutory maximum) for supplying you with such data.

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If at any time you wish us to cease processing your personal data or sensitive personal data, or to cease contacting you for marketing purposes, please contact The Data Protection Officer   
on 01932 254032 or in writing at Ember House Pleasant Place Hersham Surrey KT12 4HR.

**Future communications**

We will never sell your data to any other organisations. By ticking the box below, however, you will give your consent to us sending you a bulletin from time to time and to us drawing your attention to any investments or products or services that we think could be of benefit to you.

* Yes please, I would like to receive such communications from you via   
  email/post/phone/text message\*. *(\*Please delete, as appropriate)*

**How to withhold your consent to us processing any sensitive personal data**

* Please tick this box if you do not consent to us processing any sensitive personal data.

**Declaration**

By signing below, you are confirming that you accept the terms of this Notice. Before doing

so, please contact us if you have any queries or concerns regarding the contents of this

Notice.

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_