

PRIVACY POLICY

The Full Picture Financial Planning Limited acts as controller for the personal information you provide to us. We take your privacy seriously and this Privacy Notice explains your rights together with how we gather, use and share your personal information. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulation (GDPR).

By agreeing to our Privacy Policy, you consent to us or any company associated with us for processing, both manually and by electronic means, your personal data for the purposes of providing advice, administration and management. We confirm that all such information requested is essential to the provision of regulated advice and satisfies the requirements of the FCA.

“Processing” includes obtaining, recording or holding information or data, transferring it to other companies associated with us, product providers, the FCA or any other statutory, governmental or regulatory body for legitimate purposes including, where relevant, to solicitors and/or other debt collection agencies for debt collection purposes and carrying out operations on the information or data. If, in order to provide services to you, we are required to pass your personal information to parties located outside of the European Economic Area (EEA), it is entirely possible that those countries do not have Data Protection Laws equivalent to those applying in the UK. Where this is the case, we will take reasonable steps to protect the privacy of your information. We may also contact you or pass your details to other companies associated with us to contact you (including by telephone) with details of any other similar products, promotions, or for related marketing purposes in which we think you may be interested.

The information provided may also contain sensitive personal data for the purposes of the Act, being information as to 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 political opinions, religious or similar beliefs, sexual life, or your membership of a Trade Union. If at any time you wish us or any company associated with us to cease processing your personal data or sensitive personal data, or contacting you for marketing purposes, please contact The Data Protection Officer at the address below:

The Full Picture Financial Planning Limited
Forward House
17 High Street
Henley-In-Arden
United Kingdom
B95 5AA

You may be assured that we and any company associated with us will treat all sensitive personal data as confidential and will not process it other than for a legitimate purpose. Steps will be taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary. Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to the data.

It is now common practice to communicate and share information over the internet. Internet communications are not guaranteed to be secure and therefore we will not accept liability for any claims by you for damages or loss arising from a breach of confidentiality, breach of the GDPR regulations, mistakes arising from inaccuracies in the data transmitted by or received by us, or non-delivery of any message from or to us. Should you wish for us not to handle your data in this way, you should inform us of your preference.

Your Privacy Rights

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have the right to complain to us by writing to ValidPath Limited, Complaints Department, Maltings, East Tyndal Street, Cardiff, CF24 5EA. You can also complain to the Information Commissioner, who is the data protection regulator, at ico.org.uk/global/contact-us.

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Access to your personal information:** You can request access to a copy of your personal information. We will not normally charge for providing this information to you.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it and you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

How we gather and use personal information

We need to obtain information about you, so that we can provide the financial advice you require. We use information relating to your personal situation and financial position.

We obtain personal information:

- **Directly from you**, usually in a face-to-face meeting but potentially also by telephone or other means.
- **From other organisations** such as investment/pension/insurance providers, where you have provided authority for them to share information relating to your existing plans.
- **From your professional advisers**, where you have provided authority for them to share information.
- **Other:** We may also obtain some personal information from recording calls or meetings or by making contemporaneous notes of calls or meetings.

We hold such information as Data Controllers in accordance with the requirements of the Data Protection Act 2018 and the EU General Data Protection Regulation, together referred to as the 'Regulations'.

We use this information to analyse your current and future financial needs so that we can ensure that any subsequent advice takes due account of, and is suitable for, your circumstances. We will not share your information with any other party except as indicated in this Privacy Notice or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

Legal basis for collecting/processing information

The legal basis on which most of the information that you provide will be collected and processed is to enable us to provide the financial advice that we have agreed you require. However, some types of information require your explicit consent, particularly in relation to any adverse health history you might have. We will seek your consent if required. Where you have given us consent, you have the right to withdraw it at any time.

Where you provide data in relation to another data subject who is not present, for example your spouse, partner or child, we will assume that consent has been provided to you by that individual. This situation may arise where we need information about persons connected to you in order to provide suitable advice, or where this information is needed to appoint them as a beneficiary on a policy. Where appropriate, we may send a copy of this Privacy Notice to the connected data subject.

Keeping personal information

We keep your personal information securely for as long as we need to for the purpose of providing you with financial advice under the Terms of Business and Client Agreement (contract) or for as long as we are required to by relevant regulations.

Sharing and transferring personal information

In the course of providing suitable financial advice, we will need to share your information with certain third parties. The categories of third party we may share your information with are listed below.

- Insurance Providers
- Pension Providers
- Annuity Providers
- Investment Providers
- Investment Platforms
- Providers of Pension Transfer Comparison Reports
- Compliance Advisers
- Legal Advisers
- Back Office Systems Providers
- Third Party Software Providers

We will only share your information with third parties when necessary and will ensure that any third parties that we do share your information with have sufficient data protection processes in place.