

## PRIVACY NOTICE

### **How we use your information**

This privacy notice tells you what to expect when Trafalgar Square Financial Planning Consultants collects personal information. It applies to information we collect about you. To enable us to provide the services we have agreed and for other related purposes – including updating and enhancing customer records, analysis for management purposes and statutory returns, crime prevention and legal & regulatory compliance – we may obtain, use, process and disclose personal data about you.

We may collect and process the following data about you:

- Information that you provide by filing in forms on our site [www.trafalgarsq.co.uk](http://www.trafalgarsq.co.uk).
- Information that you provide to us by telephone; e-mail or face to face.
- If you contact us, we may keep a copy of that correspondence.

### **Visitors to our websites**

When someone visits [www.trafalgarsq.co.uk](http://www.trafalgarsq.co.uk) we use a third-party service, Wix.com to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Wix.com to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **Use of cookies by Trafalgar Square Financial Planning Consultants**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why. These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited.

### **E-newsletter**

We use email to deliver our e-newsletter. For more information, contact us.

### **Security and performance**

Trafalgar Square Financial Planning Consultants uses a third-party service to help maintain the security and performance of the ICO website. To deliver this service it processes the IP addresses of visitors to our website(s).

### **People who contact us via social media**

We managed our social media interactions internally. If you send us a private or direct message via social media the message will be stored by us for three months. It will not be shared with any other organisations.

### **People who email us**

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### **People who make a complaint to us**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. We usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer. We may be required to provide a copy of our file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint case. We are required to disclose to The Financial Conduct Authority (FCA) high level analytics concerning the number and nature of complaints received. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 7 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

### **People who use our services**

Trafalgar Square Financial Planning Consultants provide a range of Financial Services to Data Subjects. We process data provided by the data subject and other sources in order to deliver the appropriate products and services to Data Subjects.

We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a mortgage to carry out a survey to find out if they are happy with the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

### **Use of data processors**

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. Our Data processors / Third parties that we use include:

- Legal opinion where required: Alvis & Company
- Regulatory and Compliance opinion where required: Millen Compliance Ltd
- Sanctions and PEPs checking (Anti Money laundering): Smart Search
- Back Office Systems: EKeeper
- Research Software Tools: Trigold/Rentguard/Towergate/Solution Builder (iPipeline)
- AES-256 bit data encryption: RMail

### **Anti-Money Laundering Checks**

Trafalgar Square Financial Planning Consultants undertake that on each occasion that a person wishes to use our services, we shall inform the relevant individual that we may use Credit Reference Agencies for Anti Money Laundering purposes. Therefore the person must understand that we will undertake a search with a Credit Reference Agency for the purposes of verifying their identity. To do so the Credit Reference Agency may check the details we supply against any particulars on any database (public or otherwise) to which they have access. We may also use their details in the future to assist other companies for verification purposes. A record of the search will be retained.

If the individual is not so informed by us, we undertake that we shall not attempt to use the Credit Reference Agencies in respect of the relevant individual.

### **Your rights**

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you. From 25 May 2018 the General Data Protection Regulations (GDPR) come into force.

**Access to personal information (Portability)**

Data Subjects may submit a Subject Access Request - in order to obtain a copy of the personal data that we hold about them in a structured and portable manner. All SAR requests should be sent to:

Lindsay Hopkins, Trafalgar Square Financial Planning Consultants, 6 Morie Street, London SW18 1SL

Tel: 020 8870 8787 Email: info@trafalgarsq.co.uk

**Confirmation of whether, and where, the controller is processing their personal data**

Trafalgar Square Financial Planning Consultants is the Data Controller and a Processor. Trafalgar Square Financial Planning Consultants undertakes data processing within the EEA.

**Right of Data subjects to erasure (Right to be forgotten)**

Data Subjects may notify the Trafalgar Square Financial Planning Consultants if they wish to exercise their right to erasure. Such a withdrawal of Consent does not affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact. Trafalgar Square Financial Planning Consultants may retain a copy of any personal data and be retained by the Controller if the processing is necessary for the establishment, exercise or defence of legal claims.

**Right of rectification**

Trafalgar Square Financial Planning Consultants will seek to ensure that inaccurate or incomplete data will be rectified. Data Subjects have the right of rectification.

**Right to object to processing for the purposes of Direct Marketing**

Data Subjects may notify the Firm if they wish to exercise their right to be removed from any Direct Marketing activities. Trafalgar Square Financial Planning Consultants may still contact the Data Subject in order to fulfil any contractual obligations concerning the policies and services provided.

**Disclosure of personal information**

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

**Sharing Information with Third Parties**

We may share your information with third party service providers such as insurance providers, compliance, and other agents relevant to the business activity.

**Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 25<sup>th</sup> May 2018.

**How to contact us**

If you want to request information about our Privacy Policy, you can email us or write to:

Trafalgar Square Financial Planning Consultants

6 Morie Street, London SW18 1SL

**CONSENT for Trafalgar Square Financial Planning Consultants to hold, store and process your Personal Data**

Information supplied may be stored on computer or paper records and may be used for Regulatory, record-keeping, contact and marketing purposes by Trafalgar Square Financial Planning Consultants. Details may be passed to our Regulatory Authorities & Auditors for the purpose of compliance. We will NOT pass on your data to third parties for any marketing purposes.

Do you consent to this?	<b>YES</b>		Do you consent to this?	<b>YES</b>	
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<b>Client Name</b>		<b>Client Name</b>	
<b>Client Signature</b>		<b>Client Signature</b>	
<b>Date</b>		<b>Date</b>	

**CONSENT for Trafalgar Square Financial Planning Consultants to contact you**

We wish to gain your agreement, so we may contact you at any point in the future (including by telephone & email) for ongoing services & marketing purposes – for example, with valuations, details of products, services or promotions we think you might be interested in.

Do you consent to this?	<b>YES</b>		Do you consent to this?	<b>YES</b>	
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<b>Client Name</b>		<b>Client Name</b>	
<b>Client Signature</b>		<b>Client Signature</b>	
<b>Date</b>		<b>Date</b>	

(\*N.B. If a client does not wish for their data to be stored on computer records, we may be unable to act for them.)

**WITHDRAWAL OF CONSENT**

If at any time you wish us – or any company associated with us – to cease obtaining, using, processing and disclosing personal data about you (including contacting you for marketing purposes), please contact us to withdraw your consent in writing to:

Lindsay Hopkins, Trafalgar Square Financial Planning Consultants, 6 Morie Street, London SW18 1SL or by phone to Lindsay Hopkins on 020 8870 8787 or by email: [info@trafalgarsq.co.uk](mailto:info@trafalgarsq.co.uk).

Subject to certain exceptions, you are entitled to have access to your personal data held by us.