# PRIVACY NOTICE

**If you would like this document in larger print or in another format, please contact us**

*Version 3.0 | Issued October 2026 | Next review due October 2027*

## About this notice

This privacy notice tells you what to expect when Trafalgar Square Financial Planning Consultants ("we", "us", "our", "the firm") collects and uses personal information about you. It explains what we collect, why we collect it, who we share it with, how long we keep it, and the rights you have. It applies to clients, prospective clients, website visitors and anyone else who contacts us.

We are the data controller for the personal information described in this notice. Our details are:

Trafalgar Square Financial Planning Consultants, Office 01/10, The Gatehouse, 1 Armoury Way, London SW18 1TH.

Telephone: 020 8870 8787 Email: info@trafalgarsq.co.uk Website: www.trafalgarsq.co.uk

We are authorised and regulated by the Financial Conduct Authority, firm reference number 305726.

Our data protection lead is Lindsay Hopkins, who is responsible for this notice, for subject access requests and for data protection complaints. Lindsay Hopkins can be contacted at the address, telephone number and email address above. We have assessed our activities and are not required to appoint a statutory Data Protection Officer; that assessment is recorded and kept under review.

We handle your personal information in accordance with the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

## The personal information we collect

To provide the services we have agreed, and for related purposes including updating and enhancing client records, analysis for management purposes, statutory returns, crime prevention and legal and regulatory compliance, we obtain, use, process and disclose personal information about you. Depending on the service, this may include:

- Identity and contact details — name, date of birth, address history, nationality, residency status, National Insurance number, telephone numbers and email address.
- Financial information — income, employment, expenditure, bank details, existing borrowing, credit history, assets, liabilities and property details.
- Household information — marital status, dependants and their dates of birth, and details of other people connected to the transaction such as landlords, employers, estate agents and solicitors.
- Health and lifestyle information where it is relevant to a protection or insurance recommendation, or where you tell us about an access, communication or support need.
- Information about unspent criminal convictions, bankruptcy, County Court Judgments and defaults where a lender or insurer requires it.
- Information you provide by filling in forms on our site www.trafalgarsq.co.uk, by telephone, by email, by post, by WhatsApp or face to face. If you contact us, we may keep a copy of that correspondence.

## Where we obtain your information from

Most of the information we hold is given to us by you. We also obtain information about you from:

- Lenders, insurers and product providers.
- Credit reference agencies and identity and sanctions screening providers.
- Employers and accountants, where income verification is required.
- Solicitors, conveyancers, valuers and estate agents involved in your transaction.
- Introducers and referral partners who put you in touch with us.
- Publicly available sources, including HM Land Registry and public registers.

Where a joint applicant, a family member or an introducer gives us information about you, we will use it as described in this notice, and you may ask us at any time where we obtained it.

**Why we use your information and our lawful bases for doing so**

We must have a lawful basis under Article 6 of the UK GDPR for everything we do with your personal information. Our bases are set out below. We do not rely on your consent for the provision of our advice and arranging services, and you do not have to consent to general processing in order to receive those services.

| What we use your information for | Our lawful basis |
|---|---|
| Assessing your needs, giving mortgage, protection and general insurance advice, arranging and administering products, and dealing with your enquiries. | Article 6(1)(b) — necessary to perform our contract with you, or to take steps at your request before entering into a contract. |
| Verifying your identity and address; anti-money laundering, sanctions and politically exposed person screening; ongoing monitoring; suspicious activity reporting. | Article 6(1)(c) — necessary to comply with our legal obligations under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. |
| Keeping records of the advice we give, complaints handling, responding to the Financial Conduct Authority, the Financial Ombudsman Service, our auditors and our compliance advisers. | Article 6(1)(c) — necessary to comply with our legal and regulatory obligations under MCOB, ICOBS, SYSC and DISP. |
| Fraud prevention and detection, credit reference searches for verification purposes, quality monitoring, staff training, business administration, IT security, and improving our service. | Article 6(1)(f) — necessary for our legitimate interests in operating a well-run, secure and compliant regulated business. We have balanced these interests against your rights, and you may object at any time. |
| Marketing by post, and marketing by email or text message to existing clients about products similar to those you have already bought from us. | Article 6(1)(f) — our legitimate interest in promoting our services, together with the "soft opt-in" permitted by the Privacy and Electronic Communications Regulations 2003. You may opt out at any time. |
| Marketing by email, text message, WhatsApp or telephone where the soft opt-in does not apply. | Article 6(1)(a) — your consent, given separately and by channel, and withdrawable at any time. |
| Establishing, exercising or defending legal claims. | Article 6(1)(f) — our legitimate interest in protecting our legal position, and Article 9(2)(f) where special category data is involved. |

We do not currently rely on the "recognised legitimate interest" basis introduced by the Data (Use and Access) Act 2025. If that changes, we will update this notice and identify which condition applies.

We do not use your personal information to make decisions about you by solely automated means without human involvement. Lenders and insurers you apply to may do so under their own privacy notices, and you should refer to those notices for your rights in relation to their decisions.

**Health and other special category information**

Some categories of personal information are treated as more sensitive. These are information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, data concerning health, and data concerning a person’s sex life or sexual orientation.

We do collect information about your health. Our mortgage fact find asks about your general state of health, current medication, family medical history before the age of 60, height, weight, smoking status and any time you have taken off work through illness. We also ask whether you have any access, communication or disability needs so that we can support you properly, and your answer to that question may also be health information.

We use this information only to assess whether you need protection or insurance cover, to obtain accurate quotations and underwriting terms, to refer you to a protection specialist where you ask us to, and to adjust how we communicate with you.

Our conditions for processing this information are:

- Article 9(2)(a) — your explicit consent. We ask for this separately, in writing, on our fact find and at the end of this notice. You may withdraw it at any time, and withdrawal will not affect the lawfulness of anything we did before you withdrew it.
- Article 9(2)(h) read with paragraph 16 of Schedule 1 to the Data Protection Act 2018, where the information is processed for insurance purposes and it is not reasonable to expect us to obtain consent.
- Article 9(2)(f), where the information is needed for legal claims.

If you would prefer not to give us health information, tell us. We can still advise you on your mortgage. It may mean we cannot advise you on protection or insurance, and we will tell you clearly if that is the case.

**Criminal offence information**

Where a lender or insurer requires it, we ask about unspent criminal convictions and about bankruptcy, County Court Judgments and defaults. We collect this only where it is relevant to the lending or underwriting decision, and we do not ask about spent convictions.

We process this information under Article 10 of the UK GDPR relying on paragraph 12 of Schedule 1 to the Data Protection Act 2018 (preventing or detecting unlawful acts) and, where insurance is involved, paragraph 16 of that Schedule. We have recorded why this information is necessary and we review that assessment on each reissue of our forms.

**Identity checks, anti-money laundering and credit reference agencies**

We are required by law to verify your identity before we act for you, and to keep those checks up to date while we act for you. To do this we use electronic verification services, currently SmartSearch, and we carry out a search with one or more credit reference agencies.

This is not a credit application, and it is not a lending decision. The search leaves a record on your credit file that is visible to you and to the credit reference agency, but it does not affect your credit score, and other lenders cannot see it as a credit search. Where we later submit a mortgage application on your behalf, the lender will carry out its own credit search, which may leave a record that other lenders can see. We will tell you before that happens.

The credit reference agency may check the details we supply against information on any database, public or otherwise, to which it has access, and will keep a record of the search. Credit reference agencies act as independent data controllers for the searches they carry out. They explain how they use your information in the Credit Reference Agency Information Notice, which is published on each agency's website and at www.experian.co.uk/crain, www.equifax.co.uk/crain and www.transunion.co.uk/crain.

We do not pass your details to other companies so that they can verify the identity of their own customers.

We are also required to screen you against sanctions lists and to check whether you are a politically exposed person, a family member of one, or a known close associate of one. Where we are required to report a suspicion to the National Crime Agency, we are prohibited by law from telling you.

**Who we share your information with**

We share your information only where we need to. Some of the organisations we use act on our instructions as our processors; they cannot do anything with your information unless we have instructed them to, they cannot use it for their own purposes, and we have written contracts with them under Article 28 of the UK GDPR requiring them to keep it secure and to retain it only for as long as we say.

**Our processors include:**

- eKeeper — our client management and back-office system.
- XPlan, Trigold, Solution Builder and other research tools supplied by iPipeline, Vasek and Everywhen — used to research and compare products.
- RMail — used to send documents to you with AES-256 encryption.
- Rapid Quote — used to obtain protection quotations.
- Our website host and our website analytics provider.
- Our IT support, document storage and email providers.

Other organisations receive your information as independent data controllers in their own right. That means they decide for themselves how to use it, and they will handle it under their own privacy notices, which we recommend you read. They include:

- Lenders, insurers, product providers and their administrators, where you ask us to submit an application or arrange cover.
- Credit reference agencies, and SmartSearch as our identity and sanctions screening provider.
- Solicitors and conveyancers — Wilkin Chapman, Broker Conveyancing, Movin Legal, ConveyBuddy and SortRefer — where you ask us to refer you.
- Accountants — Peplows (Accountants) Ltd and Property Accounts Limited — where an accountancy opinion is required.
- Protection and specialist advice firms — including LifeSearch, Simply Zest and independent financial advisers we nominate — where you ask us to refer you.
- AML Consulting, our external compliance adviser, and our auditors, where a regulatory or compliance opinion or a file review is required.
- The Financial Conduct Authority, the Financial Ombudsman Service, the Information Commissioner, HM Revenue and Customs, the National Crime Agency, the police and the courts, where we are required or permitted to disclose information to them.
- A purchaser or successor to our business, or our professional indemnity insurers and legal advisers where a claim is made or threatened.

We will pass your information to a referral partner only where you have agreed to the referral. We may receive a fee for a referral, and we will tell you if we do. We will not pass your information to any third party for that third party's own marketing purposes.

**Sending information outside the United Kingdom**

We are based in the United Kingdom, and we store your information in the United Kingdom. Some of the suppliers we use are part of international groups and may access or store information outside the United Kingdom, including in the United States and the European Economic Area.

Where that happens, we make sure the transfer is protected by one of the safeguards allowed by UK data protection law — an adequacy decision made by the United Kingdom, the International Data Transfer Agreement, or the United Kingdom Addendum to the European Commission Standard Contractual Clauses — and we carry out a transfer risk assessment before the transfer begins. You may ask us for a copy of the safeguards we rely on.

**How long we keep your information**

We keep your information only for as long as we need it. Our retention periods are:

| Record | Retention period | Period runs from |
|---|---|---|
| Anti-money laundering and customer due diligence records, including identity verification and screening results | 5 years | The end of our business relationship with you, or the completion of the occasional transaction |
| Mortgage and home finance advice and suitability records | At least 3 years, and for lifetime mortgages and other higher-risk cases for the duration of the product plus 6 years | The date the advice was given |
| Insurance and protection records | 6 years | The end of the policy |
| Complaint files | 7 years | Closure of the complaint |
| Client contract, fee agreement and correspondence | 6 years | The end of our business relationship with you |
| Direct marketing suppression records (so that we do not contact you again) | Retained indefinitely | The date you opted out |
| Private or direct messages received through social media | 3 months | Receipt of the message |
| Website analytics information | 26 months | Collection |

Where a longer period is required by law, or where information is needed for a live or threatened legal claim, regulatory investigation or complaint, we will keep it until that matter is resolved. At the end of the retention period information is securely deleted or destroyed.

**Keeping your information secure**

We have appropriate technical and organisational measures in place to protect your information against unauthorised or unlawful processing and against accidental loss, destruction or damage, as required by Article 32 of the UK GDPR. These include access controls on a need-to-know basis, encrypted email using RMail for documents containing personal information, secure storage of paper records, and staff training.

If a personal data breach occurs and it is likely to result in a risk to your rights and freedoms, we will report it to the Information Commissioner within 72 hours of becoming aware of it. Where the breach is likely to result in a high risk to you, we will tell you without undue delay. We keep a record of all personal data breaches, whether or not they are reportable.

**Marketing and our e-newsletter**

We would like to keep in touch with you about our services, including mortgage reviews and rate expiry reminders, and to send you our e-newsletter.

Where you are an existing client and the marketing relates to services similar to those we have already provided, we rely on our legitimate interests together with the soft opt-in under the Privacy and Electronic Communications Regulations 2003. In every other case we rely on your consent, which we ask for separately for each channel at the end of this notice.

Whatever the basis, you can stop marketing at any time. Every email and e-newsletter contains an unsubscribe link, and you can also tell us by telephone, email or in writing using the contact details in this notice. We will act on your request without delay, and we will keep a note of it so that we do not contact you again. Stopping marketing will not affect the service we provide to you, and we will still contact you where we need to in order to administer your mortgage or policy or to meet a legal or regulatory obligation.

**Your rights**

You have the following rights in relation to your personal information. They are not absolute and, in some cases, we may be required or entitled to refuse a request; if that happens, we will explain why.

- The right to be informed — to be told how we use your information, which is the purpose of this notice.
- The right of access (Article 15) — to obtain a copy of the personal information we hold about you.
- The right to rectification (Article 16) — to have inaccurate or incomplete information corrected or completed.
- The right to erasure (Article 17) — to ask us to delete your information. We may not be able to do so where we are required by law to keep it, or where we need it for a legal claim.
- The right to restrict processing (Article 18) — to ask us to pause our use of your information, for example while we check its accuracy.
- The right to data portability (Article 20) — where we process information you gave us by automated means under a contract or with your consent, to receive it in a structured, commonly used and machine-readable format, or to have it sent to another organisation.
- The right to object (Article 21) — to object at any time to our use of your information for our legitimate interests, and an absolute right to object to direct marketing.
- Rights in relation to automated decision-making and profiling (Articles 22A to 22D) — including the right to be told about a significant decision taken solely by automated means, to make representations about it, to obtain human intervention and to contest it.
- The right to withdraw consent — where we rely on your consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of what we did before you withdrew it.
- The right to complain — to us, and to the Information Commissioner.

There is no charge for exercising these rights unless a request is manifestly unfounded or excessive. We will respond within one month, which we may extend by up to two further months for complex requests, telling you if we do.

**How to make a subject access request**

You may ask for a copy of the personal information we hold about you at any time. Requests should be sent to:

Lindsay Hopkins, Trafalgar Square Financial Planning Consultants, Office 01/10, The Gatehouse, 1 Armoury Way, London SW18 1TH.

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

We may ask you for proof of identity before we release information, and we may ask you to help us narrow your request. When we search for your information, we are required to carry out a reasonable and proportionate search; this means we will make a thorough search of the systems where your information is likely to be held, but we are not required to search every system without limit.

**How to complain to us about the way we have used your information**

If you are unhappy with how we have handled your personal information, or how we have dealt with a request you have made, please tell us. You have a right to complain to us directly and we would rather have the chance to put things right.

Send your complaint to Lindsay Hopkins, our data protection lead, by any of these routes:

- Email: info@trafalgarsq.co.uk marked "Data protection complaint".
- Post: Lindsay Hopkins, Data Protection Complaint, Trafalgar Square Financial Planning Consultants, Office 01/10, The Gatehouse, 1 Armoury Way, London SW18 1TH.
- Telephone: 020 8870 8787 — we will record the complaint for you and confirm it in writing.

You do not need to use any particular form of words, and you do not need to refer to any legislation. We will:

- acknowledge your complaint in writing within 30 days of receiving it;
- investigate it and respond to you without undue delay, telling you what we have found and what we have done about it; and
- keep you informed if our investigation is going to take longer than we expected.

This is a separate process from our general complaints' procedure. If your complaint contains both a service element and a data protection element we will deal with the data protection element under this process and to these timescales, which are shorter than the timescales that apply to regulated complaints. The Financial Ombudsman Service is not the escalation route for a data protection complaint; the regulator is.

**How to complain to the regulator**

You also have the right to complain to the United Kingdom supervisory authority for data protection. You may do this at any time, but we would ask you to raise your concern with us first so that we have the opportunity to resolve it.

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline: 0303 123 1113  Website: www.ico.org.uk/make-a-complaint

From 30 September 2026 the Information Commissioner's Office becomes the Information Commission. Its powers and its role are unchanged, and its contact details remain the same.

**Visitors to our website**

When someone visits www.trafalgarsq.co.uk we use a third-party service to collect standard internet log information and details of visitor behaviour patterns, so that we can see how the various parts of the site are used. We also use a third-party service to help maintain the security and performance of the site, which involves processing the IP addresses of visitors. We do not attempt, and we do not allow our suppliers to attempt, to identify individual visitors from this information. Where we do want to collect information that identifies you through our website, we will say so at the point we collect it and explain what we intend to do with it.

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

Cookies are small text files placed on your device by websites you visit. They are widely used to make websites work, or work more efficiently, and to provide information to the owners of the site.

We use cookies that are strictly necessary for the site to function, and analytics cookies that tell us how many people visit the site, which pages they look at and where they came from. Analytics information is aggregated for reporting, but a cookie identifier can still relate to a device, so we do not claim that it is anonymous.

Cookies that are strictly necessary, and certain low-risk statistical and website-functionality cookies now permitted by the Data (Use and Access) Act 2025, may be set without your consent, but we will still tell you about them and you have the right to object. All other cookies, including any advertising cookies, are set only if you agree through the banner shown when you first visit the site. You can change your choices at any time using the cookie settings on the site, or through your browser settings.

For general guidance on cookies and on managing them, see the Information Commissioner's website at www.ico.org.uk/for-the-public/online/cookies.

**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. Ordinary email is not a secure medium, so where we send you documents containing personal or financial information, we will normally use RMail encryption.

**People who contact us via social media**

We manage 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 organisation. Please do not send us personal or financial details through social media; we will ask you to contact us by telephone, secure email or post instead.

**People who make a complaint to us**

When we receive a complaint, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and of any other individuals involved. We use that information only to investigate the complaint and to monitor the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about, and where a complaint is referred onwards, we may be required to provide a copy of our file to the Financial Ombudsman Service or to the Information Commissioner.

Complaint files are held in a secure environment with access restricted on a need-to-know basis and are retained for 7 years from closure of the complaint.

**Changes to this notice**

We keep this notice under regular review and will update it whenever our processing or the law changes. This is version 3.0, issued on October 2026. The next scheduled review is October 2027. Where a change is significant, we will draw it to your attention. The current version is always available on request and at www.trafalgarsq.co.uk.

**CONSENT — health and other special category information**

We need your explicit consent before we use information about your health for the purposes described in the section "Health and other special category information" above. This is used to assess your protection and insurance needs and to obtain accurate quotations and underwriting terms.

You do not have to give this consent. If you do not, we can still advise you on your mortgage, but we may be unable to advise you on protection or insurance. You may withdraw this consent at any time by contacting us, and withdrawal will not affect anything we have already lawfully done.

| **I explicitly consent to Trafalgar Square Financial Planning Consultants collecting and using information about my health for the purposes set out above** | **Client 1 — YES / NO** | **Client 2 — YES / NO** |
|---|---|---|

| | | | |
|---|---|---|---|
| **Client Name** | | **Client Name** | |
| **Client Signature** | | **Client Signature** | |
| **Date** | | **Date** | |

**CONSENT — how we may contact you with marketing**

We would like to keep in touch about our services, reviews, rate expiry reminders and our e-newsletter. Please tell us which channels you are happy for us to use. Each choice is separate and you may change any of them at any time without giving a reason, and without affecting the service we provide to you. Leaving a box blank means No.

| **Channel** | **Client 1 — YES / NO** | **Client 2 — YES / NO** |
|---|---|---|
| Post | | |
| Email, including our e-newsletter | | |
| Telephone | | |
| WhatsApp | | |

| | | | |
|---|---|---|---|
| **Client Name** | | **Client Name** | |
| **Client Signature** | | **Client Signature** | |
| **Date** | | **Date** | |
| **Consent captured by (adviser)** | | **Consent captured by (adviser)** | |

To withdraw any consent, or to stop all marketing, contact Lindsay Hopkins at Trafalgar Square Financial Planning Consultants, Office 01/10, The Gatehouse, 1 Armoury Way, London SW18 1TH, by telephone on 020 8870 8787, or by email to info@trafalgarsq.co.uk. Withdrawing consent does not affect the lawfulness of any processing carried out before it was withdrawn, and it does not affect processing we carry out under a different lawful basis, such as our regulatory record-keeping obligations.

**ACKNOWLEDGEMENT OF RECEIPT**

This is not a consent to processing. It records only that we have given you this notice, as we are required to do by Article 13 of the UK GDPR.

| **I confirm I have received and read the Trafalgar Square Financial Planning Consultants Privacy Notice, version 3.0 dated October 2026** |
|---|
| **Client 1 name and signature:** |
| **Client 2 name and signature:** |
| **Date:** |
| **Issued by (adviser):** |