

## PCWM Limited Privacy Notice

PCWM limited are 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

PCWM Ltd is a company registered in England under number 08959908

Our registered office is at Partnership House, 40-42 Beverley Road, Kingston upon Hull, HU3 1YE.

We are authorised and regulated by the Financial Conduct Authority.

Our Financial Services Register number is 628009 and our ICO registration number is ZA085510

### 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 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 PCWM 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 PCWM Limited 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.

**Use of cookies on our website:** A cookie is a small text file that is downloaded onto your computer when you visit certain websites and allows a website to recognise a user's computer. Cookies are used to help users navigate websites more efficiently and to perform certain functions, as well as to provide information to the owners of the website.

**Google Analytics:** This website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of our website and compile reports for us on activity of our website.

**What Information do we collect:** Each time you visit our website, we may automatically collect the following information:

Web usage information (e.g. IP address), your login information, browser type and version, time zone setting, operating system and platform. Information about your visit, including the full Uniform Resource Locators (URLs) clickstream to, through and from our website (including date and time); time on page, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs).

Location, device and demographic information (Google Analytics provides age range and gender information. Find out more about how Google collects demographic data).

We have activated Google's IP Anonymization function which means that your IP address is anonymized as soon as technically feasible and therefore never exposed during reporting. Personally Identifiable Information (PII) is NOT collected via our website.

**How do I restrict or delete cookies?** The cookies we use are essential for parts of the website to operate, some may have already been set. You may delete and block all cookies from this website, but please be aware that restricting or deleting cookies may impact on the functionality of the website. Your web browser may allow you to restrict or delete cookies set by this

website. The Help function within your browser should tell you how. Alternatively, you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org) which provides general information about cookies and how you can manage cookies on your computer.

**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 Data Protection Officer.

### **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, PCWM Ltd, Partnership House, 40-42 Beverley Road, Kingston upon Hull, HU3 1YE.

E-mail: [kspark@tipfs.co.uk](mailto: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**

If you have any questions about this privacy notice or the information we hold about you then please contact us.