



## Customer Privacy Notice

Friar Gate Independent Financial Services (referred to in this policy as "we", "us" or "our") are a limited company registered in England and Wales under registration number 05071304, and we have our registered office at 5 Prospect Place, Millennium Way, Pride Park, Derby, DE24 8HG. We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO") in relation to our processing of Personal Data under registration number Z8768913.

### Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (**Your Personal Data**). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

This privacy notice applies to you if:

1. You visit our website
2. You purchase products or services from us
3. You enquire about our products and/or services
4. You sign up to receive newsletters and/or other promotional communications from us
5. You or your employer enter into a contractual relationship with us as a supplier or partner

### What do we mean by "Your Personal Data"?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, National Insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your Investment and Insurance requirements Your Personal Data may include:

- Your personal details (for example, your name, date of birth, identification details like passport information).
- Your contact details (for example, your postal address, phone number, email address, corporate email address, corporate mobile number, and mobile number).
- Your images on CCTV
- Special categories of personal data such as data relating to medical health.
- Information about your lifestyle.
- Financial details (for example, salary and other income, details of accounts held with other providers, loans, mortgage, and other debts; and your bank account and bank card details).
- Education and employment details, role, and employment status.

- Your interactions with us. This includes your online behaviour and online identifiers collected through cookies deployed on our website and social media.
- Personal data about other people (such as your family, joint account holders, people you appoint under a power of attorney (your attorney) or as trustees).
- Information about your digital devices when you interact with us online. This includes the IP address that your device is connected to, the type of device you use, the operating system and screen resolution.
- Information from our records about any other Friar Gate products and services you currently have, you have had or have applied for in the past.

### **Other sources where we collect information about you**

We may also collect information relating to you from the following:

- Credit reference agencies who may check their information against other databases. This information may also be collected about others who you provide information about.
- Credit reference agencies may provide us with credit reference check information about others whose information you have provided to us such as your family, joint account holders, people you appoint as your attorney or trustees. This may leave a 'soft' footprint on their credit profile, and you should make them aware of this.
- Fraud prevention agencies.
- Organisations that provide personal data that they collect or that they get from other third parties. This information will help us to improve the quality of personal data we hold, and to provide more relevant products and services to you.
- Your employers may provide information about your employment, salary, and employment status.
- Your employer may provide your corporate information such as corporate email addresses, mobile number, and role.
- People appointed to act on your behalf – your attorney or trustees.
- Publicly available sources, such as media stories and online registers or directories. This includes businesses that you own or are associated with including investment companies, trusts or partnerships. We also collect information on the directors, partners, trustees, authorised officers, or agents of those businesses.

### **The basis upon which our Firm will deal with Your Personal Data**

When we speak with you about your investment and insurance requirements we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from Investment and Insurance Providers and our Compliance Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal data for contractual responsibilities we may owe our regulator The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

## The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with for example your insurance needs, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (**Your Special Data**). We will record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

## How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to investment, finance and insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Personal Data for example software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used. If you use our carpark and premises your image will be captured on our CCTV systems.

## What happens to Your Personal Data when it is disclosed to us?

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems *hard drives, and cloud facilities*. This information can only be accessed by employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Product Providers and Insurance Product providers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.

- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investments, or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

### Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Investment Providers and insurance providers
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our Compliance Advisers, Product specialists, providers of legal services, (in each case where we believe this to be required due to your particular circumstances).

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your investment and insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

### Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

### Your rights in relation to Your Personal Data

Individuals are provided with legal rights governing the use of their personal data. These rights are known as 'individual rights' under the UK GDPR and the Data Protection Act 2018. The following list details these rights:

- **Right to be informed** - You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access (commonly known as a "Subject Access Request")** - You have the right to receive a copy of the personal data we hold about you.
- **Right to rectification** - You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure (commonly known as the right to be forgotten)** - You have the right to ask us to delete your personal data.

- **Right to object to processing** - You have the right to object to us processing your personal data. If you object to us using your personal data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing** - You have the right to restrict our use of your personal data.
- **Right to portability** - You have the right to ask us to transfer your personal data to another party.
- **Automated decision-making**. - You have the right not to be subject to a decision based solely on automated processing which will significantly affect you.
- **Right to withdraw consent** - If you have provided your consent for us to process your personal data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint** - You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your personal data. In the first instance please contact our Office Team if you are unhappy with any aspect of the processing of your data via email please contact us via email at [info@friargate.net](mailto:info@friargate.net)

or write to us at:

5 Prospect Place  
Millennium Way  
Pride Park  
Derby  
Derbyshire  
DE24 8HG  
UNITED KINGDOM

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to **Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.**

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Website

**Cookies:** We also place a small text file that is commonly known as a cookie on your computer. Cookies are text files that gather small amounts of information, which your computer or mobile device stores when you visit a website. When you return to the website, they recognise these cookies on your device. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using certain features. We use cookies to track visitor use of the website and to compile statistical reports on website activity.

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

We also use cookies in some of our emails to help us understand how you interact with our emails, and to help us improve our future email communications. These cookies also help us make sure that the marketing you see online are more relevant to you and your interests.

For further information visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Informing us of changes to your personal data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## How to contact us and our Data Protection Officer?

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any questions regarding this policy and its content or you wish to exercise your legal rights, please contact us via email at [info@friargate.net](mailto:info@friargate.net)

or write to us at:  
5 Prospect Place  
Millennium Way  
Pride Park  
Derby  
Derbyshire  
DE24 8HG  
UNITED KINGDOM

## Changes to our privacy policy

We keep our privacy policy under regular review and may change or update this privacy policy at any time. If such changes will have a major effect on how we use your personal data or on you personally, we will give you enough notice to allow you to exercise your rights (for example, to object to the processing).

**Version Control**

<b>Current Version</b>	March 2024
<b>Reviewed By</b>	Andrew Lyon – Compliance Oversight
<b>Next Review</b>	March 2025