

Privacy Notice

This privacy notice tells you what to expect when Fiona Gray Financial Planning Ltd collects personal information. It applies to information we collect about you.

How we use your information

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.graymoney.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.

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.

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 use our services

Fiona Gray Financial Planning Ltd 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 used our services 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

If you agree, we may email you about other products or services that we think may be of interest to you. We will not share your information for marketing purposes with companies outside our group of companies or with other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit such as password protection.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

People who make a complaint to us

When we receive a complaint from a person, details of the complaint including the identity of the complainant and any other individuals involved in the complaint, are forwarded to our Compliance Officer for investigation. 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 also 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.

Personal information relating to a complaint will be retained indefinitely from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Your rights

Under the General Data Protection Regulations (GDPR) you have rights as an individual which you can exercise in relation to the information we hold about you.

Your rights as an individual which you can exercise in relation to the information we hold about

- **Access to Personal Information (Portability)**

Data Subjects may submit a Subject Access Request (SAR) - 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:

Data Protection Officer: Fiona Gray, Fiona Gray Financial Planning Ltd, The Old Forge, 39a Woburn Street, Ampt Hill, Beds, MK45 2HX. Telephone: 01525 712122. Email: fgray@graymoney.co.uk

- **Confirmation of Whether, and Where, the Controller is Processing Personal Data**

Fiona Gray Financial Planning Ltd is the Data Controller and a Processor. Fiona Gray Financial Planning Ltd undertakes data processing within the EEA.

- **Right of Data Subjects to Erasure (Right to be Forgotten)**

Data Subjects may notify the Fiona Gray Financial Planning Ltd 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. Fiona Gray Financial Planning Ltd 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**

Fiona Gray Financial Planning Ltd 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. Fiona Gray Financial Planning Ltd may still contact the Data Subject in order to fulfil any contractual obligations concerning the policies and services provided.

How to contact us

If you want to request information about our Privacy Policy, you can email us at fgray@graymoney.co.uk or write to us:-

Fiona Gray Financial Planning Ltd, The Old Forge, 39a Woburn Street, Ampt Hill, Beds, MK45 2HX

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 21st May 2018.