

Browning Financial Planning Limited  
Morar, Brooklands Lane, Torquay, TQ2 6PH  
Tel: 01803 606766 Email: [mail@dombrowning.co.uk](mailto:mail@dombrowning.co.uk)  
Registered office: 34/36 Fore Street, Bovey Tracey, TQ13 9AD  
Company Number: 8448809  
Authorised and Regulated by the Financial Conduct Authority

**1<sup>st</sup> May 2018**

## **Customer Privacy Notice**

### **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.

### **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 advice in relation to your Pension, Investment or Insurance requirements Your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependants
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any pre-existing pension/ investment/mortgage/finance and/or insurance products and the terms and conditions relating to these
- Details of your beneficiaries or others where the information could be required to provide you with advice

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

When we speak with you about your pension/investment or 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 are allowed to use Your Personal Data for the purposes detailed in this document.

In addition, either in the course of initial discussions with you, or when the contract between us has come to an end for whatever reason, we are still allowed to use Your Personal Data as long as 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 Insurance and Product Providers and our Compliance Support Advisers 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 may need to use Your Personal data for contractual responsibilities we 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 for 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.

We will use Your Special Data in the same way generally as Your Personal Data, as set out in this Privacy Notice.

Information in the Special Category Data must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the insurance protection that they 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 pensions/investment and/or insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, ID 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, we will only do this if we have consent from you for us or the processing service we are using to access your information in this manner. With regards to electronic ID checks, although we would not require your consent, we will inform you of how such software operates and the purpose for which it is used if you wish.

### **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. This information can only be accessed by employees 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/or 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 providers may raise
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any pension/ investment/and/ 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 need to be shared with:

- Pension Providers / Investment Providers / Insurance Companies
- 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 our Compliance Support Advisers, Product specialists and providers of legal services such as estate planners or similar professionals (only when 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 pension/investment and/or insurance enquiry and to provide you with our professional services.

We can confirm that this sharing of Your Personal Data does not entitle 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 will only share information required on a confidential basis and only when the recipient has undertaken to be bound by the General Data Protection Regulation (GDPR - Regulation (EU) 2016/679). This also applies in the event that your data is shared outside the European Economic Area.

### **Security and retention of Your Personal Data**

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

In order to protect your Data, we ask that you also take reasonable steps to safeguard your own privacy when transferring information to us. For example, please do not send confidential information over unprotected email, please ensure email attachments with confidential data 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 when we are required to keep the information longer we may retain records indefinitely.

### **Your rights in relation to Your Personal Data**

You can:

- request copies of Your Personal Data that we hold and is under our control
- ask us to further explain how we use Your Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish

- change the basis of any consent you may have provided to allow us to send marketing in the future

### **How to make contact with our Firm in relation to the use of Your Personal Data**

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact either:

Dominic Browning – Director

Browning Financial Planning Ltd

Morar

[mail@dombrowning.co.uk](mailto:mail@dombrowning.co.uk)

01803 606766

Brooklands Lane

Torquay

TQ2 6PH

You should 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 request a copy of your data, we will inform you at the time if we believe either: we should action your request for data in a different way or depending on the circumstances we cannot deal with your request.

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. Our ICO registration number is Z9248272

### **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 for marketing purposes, please contact us in writing to withdraw your consent:

Please write to:

The Data Controller, Browning Financial Planning Limited, Morar, Brooklands Lane, Torquay, TQ2 6PH.

If you are unsure about how we use your data or wish to vary the consent you are welcome to discuss this first.

You are entitled to have access to your personal data held by us, this is subject to certain exceptions.

## General Data Protection Regulation Client Declaration and Consent

Browning Financial Planning Ltd confirm that, when processing data on your behalf, we will comply with the relevant provisions of the General Data Protection Regulation (**GDPR - Regulation (EU) 2016/679**) as described in our Customer Privacy Notice dated 1<sup>st</sup> May 2018 issued with this consent form.

I/We \_\_\_\_\_ have received the Browning Financial Planning Ltd Customer Privacy notice dated 1<sup>st</sup> May 2018

*Signed* ..... Date .....

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### CONSENT 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 Browning Financial Planning Limited.

Do you consent to this? YES  NO

*Signed* ..... Date .....

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### CONSENT to share Your Personal Data

We **WILL NOT** pass on your data to third parties for any marketing purposes.

Details may be passed on a confidential basis to:

Our Regulatory Authorities, Auditors, Compliance Support Advisers,  
pension/investment product/insurance providers and/or as required by law

Do you consent to this?

YES  NO

Your other professional advisers e.g. Solicitor / Accountant

YES  NO

Do you consent to us sharing any information such as valuations of your plans with:

Your partner or spouse insert name .....

YES  NO

Other parties insert name .....

YES  NO

*Signed* ..... Date .....

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### CONSENT for Browning Financial Planning Limited to contact you

Browning Financial Planning Ltd wish to gain your express agreement, so that we may contact you at any point in the future:

for ongoing services, for example valuations?

Do you consent to this?

YES  NO

for marketing purposes of products or services we think might be of interest to you?

YES  NO

Please indicate all the methods of contact that are suitable:

Post

Phone

SMS/Text

Email

Instant Messaging

*Signed* ..... Date .....

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