



**WHICH WAY**  
FINANCIAL SOLUTIONS

# PRIVACY NOTICE

**Updated: 23 May 2018**

# Privacy Notice: Which Way Financial Solutions Ltd

This privacy notice explains how we use any personal information we collect about you.

## What information do we collect about you?

We collect information about you when you engage us for financial services i.e. advice and/or support (on a one off and/or on-going basis). This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We may use your information collected from the website to personalise your repeat visits to the site.

## Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

## Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we'll obtain your explicit consent in order to collect and process this information.

## How will we use the information about you?

We collect information about you in order to provide you with the services for which you engage us.

## Who might we share your information with?

*If you agree*, we may email you about other products or services that we think may be of interest to you.

We won't share your information for marketing purposes 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, administration 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. Where possible, we will use a secure cloud-based website to transfer data between you, us and appropriate providers (this is provided by Intelliflo and called Intelligent Office); as an alternative, we will use either secure e-mail and/or e-mail with any attachments present password protected, with the password being sent to the recipient usually by text or phone call.

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.

### How long do we keep hold of your information?

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

We're also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business
- Indefinitely for pension transfers and opt-out business
- Three years for insurance business

These are minimum periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so. If you decide you no longer wish to engage with us for on-going services, we will contact you, usually by e-mail, to ask what you would like us to do with your data:

- Delete data (no records will exist other than any Statutory Information that we need to hold or that is required to ensure our back-office systems retain accurate information to function correctly i.e. from an accounting point of view)
- Retain data (with your permission: we can retain the data; which can be restricted if you wish; so, if there is a question or query in the future we have the information to assist you)
- Remain engaged for some form of on-going service (we retain the data and our relationship with you)

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

### Work Undertaken Pre-Engagement for a Specific Service

In some situations, before we have engaged with you for a specific service, we may scope the work involved, for example: a review of existing pension arrangements. In this case you are providing us with your authority to find out information about your arrangements and you are authorising us to hold relevant personal information about you. In this situation we will hold the data for up to 12 months; if you haven't formerly engaged with us before then we delete all relevant information unless you give us further permission to hold onto your data.

### How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information; please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

### Marketing

We'd like to send you information about our products and services which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

### Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

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.

### Other websites

Our website may contain links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

### What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

#### Information Commissioner's Office

**A:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. **T:** 0303 123 1113 (local rate)

### Changes to our privacy policy

We keep our privacy policy under regular review and we'll place any updates on this web page: <http://whichwayfs.com/about/legal-details/>. This privacy policy was last updated on 23 May 2018.

### How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at [info@whichwayfs.com](mailto:info@whichwayfs.com)

Or write to us at Which Way Financial Solutions Ltd, Pera Business Park, Nottingham Road, Melton Mowbray, LE13 0PB