

## Privacy Policy

We understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our site. If you do not accept and agree with this Privacy Policy, you must stop using our site immediately.

### What does this policy cover?

This Privacy Policy applies only to your use of our site. Our site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of personal data;
- The right of access to the personal data we hold about you (see section 12);
- The right to rectification if any personal data we hold about you is inaccurate or incomplete;
- The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (We only hold your personal data for a limited time, as explained in this policy but if you would like us to delete it sooner, please contact us);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about our use of your personal data, please contact us and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (details below).

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

### What information do we collect about you?

We collect information about you when you engage us for financial planning, so that we can provide the most appropriate strategy for your circumstances. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as your health. This data will only ever be collected as part of the advisory process and we will explain this to you at our meeting prior to proceeding.

We may also 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.

Depending upon your use of our website, we may collect some or all of the following personal and non-personal data:

- Name;
- Contact information such as email addresses and telephone numbers;
- Demographic information such as post code, preferences, and interests;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

Our website contains 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.

### 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 our services for you in an effective manner. Without collecting your personal data, we would not be able to fulfil our legal and regulatory obligations. Where special category data is required, we will obtain your explicit consent to collect and process this information.

### How will we use the information about you?

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

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone, text message and/or post with information, news and offers.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

### Who might we share your information with?

We will **NOT** share your information outside SGM Financial Management Ltd for marketing purposes.

To be efficient and effective, 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 will 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 will only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party, we will use appropriate security measures to protect your personal data in transit. **For awareness, to enhance the security of the data during transfer all devices are data encrypted and all devices are secured as per industry guidelines.**

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.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

We may compile statistics about the use of our site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

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

We will retain personal data which is necessary to provide services to you and we will take all reasonable steps to keep your personal data up to date through regular reviews and ongoing discussions.

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

- Three years for insurance business and mortgage business
- Five years for investment business
- Indefinitely for pension transfers and opt-out 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 is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than seven years after our relationship with you has ended.

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

## What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## Your Right to Withhold Information

You may access certain areas of our site without providing any personal data at all. However, to use all features and functions available on our site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies.

## Our Use of Cookies

Our site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our site

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 or you may lose any information that enables you to access our site more quickly and efficiently including, but not limited to, login and personalisation settings. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

Third parties whose content appears on our site may use third party Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

## 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. Under the GDPR, no fee is payable, and we will provide any and all information in response to your request free of charge. If you would like a copy of some or all your personal information, please email or write to us using the contact details noted on this website.

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.

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

## Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on our website, please see [www.sgmfinancialmanagement.co.uk](http://www.sgmfinancialmanagement.co.uk) and click on the Privacy Policy link which can be found in our website menu. This Privacy Policy was last updated on 23 July 2021.