



IMPORTANT INFORMATION

Please keep for future reference

Broadleaf Financial Services Ltd - Privacy Notice

Please read this Privacy Notice so you are aware of how we process your personal information.

Your rights, your information and how we use it

Broadleaf Financial Services Ltd (BFS) Privacy Notice contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

At times we may need to make changes to our Privacy Notice; details will be posted on our website, please check for updates from time to time. We will contact you if there are any important changes such as changes to where your personal data will be processed; we will contact you to let you know.

Who we are

Broadleaf Financial Services Ltd (BFS) is an Independent Financial Adviser firm. Our office is situated at Broadleaf Chambers, Mount Avenue, Heswall, Wirral, CH60 4RH.

Telephone: 0151 342 7700.

Email: dpquery@broadleaffs.co.uk

BFS is authorised and regulated by the Financial Conduct Authority. Our FCA number is 231 686.

How to contact us

If you have any questions about our Privacy Notice or the information we collect or use about you, please contact;

John Shaw - Compliance Officer
Broadleaf Financial Services Ltd
Mount Avenue
Heswall
Wirral
CH60 4RH

Email: dpquery@broadleaffs.co.uk

Information we collect and use

Information we collect and use includes:

- Information about who you are eg your name, date of birth and contact details;
- Information connected to your product or service with us eg your bank account details; employment details;
- Information about your contact with us eg meetings, phone calls, emails / letters;
- Information classified as 'sensitive' personal information eg relating to your health, marital or civil partnership status. This information will only be collected and used where it is needed to provide the product or service you have requested or to comply with our legal obligations;
- Information you may provide to us about other people eg joint applicants or beneficiaries for contracts you hold. You must have their authority to provide their personal details to us and give them a copy of this Policy Notice;
- Information on children eg where a child is named as a beneficiary on the policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender).

Where we collect your information

We may collect your personal information from you, from a variety of sources, including:

- An application form for a product or service;
- A specific request for a product or service;
- Research;
- Phone conversations with us;
- Emails or letters you send to us;
- Contact with one of our financial advisers and/or BFS support staff;
- Completion of a Financial Questionnaire;
- From our website;
- Your employer, if part of a Company Pension Scheme.

We may also collect information from publicly available sources eg to check or improve the information we hold (eg address) and for Money Laundering purposes.

What we collect and use your information for

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- You have given us your permission (consent) to send you information about products and services you have requested;
- It is necessary to provide the product or service you have requested eg we may require some personal information eg: your name; address; date of birth; bank account details; salary; health details;
- It is necessary for us to meet our legal or regulator obligations eg to send you Annual Statements, tell you about changes to Terms and Conditions; for the detection and prevention of fraud; to meet our legal and regulatory obligations;
- It is in the legitimate interests of a third party eg sharing information with providers/life offices for research on products.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with products and services.

Who we may share your information with

We may share your information with third parties for the reasons outlined in ‘What we collect and use your information for’.

These third parties include:

- Our regulator and Supervisory Authority eg the Financial Conduct Authority (FCA);
- Product Providers and Life Offices;
- Providers and companies we have chosen to support us in the delivery of the products and services we offer to you and other customers eg research, technology companies;
- The Information Commissioner’s Office for the UK (the ICO); the Financial Ombudsman Service (FOS), to deal with any disputes;
- Law enforcement, credit and identity check agencies for the prevention and detection of crime;
- HM Revenue & Customs (HMRC) eg for the prevention of tax avoidance;
- Your employer if you are part of a Company Pension Scheme.

We will never sell your details to a third party for marketing. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Where your information is processed

The majority of our information is processed in the UK and European Economic Area (EEA).

How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically.

Our security controls provide an environment that effectively manages risks to the confidentiality, integrity and availability of your information.

How long we keep your information

We will keep your personal information only where it is necessary to provide you with information about your contracts and our services whilst you are a client.

We may retain your information after this period, particularly where we need to withhold destructions or disposal, where we are required to meet our legal or regulatory obligations. This is intended to make sure that we will be able to produce records as

evidence, if they are needed. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how BFS use your information within the General Data Protection Regulation (GDPR) 25 May 2018 and we have detailed these below:

The right to be informed

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with - we do this in our Privacy Policy.

The right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a written request to BFS.

The right to rectification

If your personal information is inaccurate or incomplete, you can request that it is corrected.

The right to erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for BFS to continue to have it - such as our legal or regulatory obligations.

The right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information - but only to ensure we do not use it in the future for those reasons you have restricted.

The right to data portability

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way.

The right to object

You can object to BFS processing your personal information where: it is based on our legitimate interests (including profiling); for direct marketing (including profiling); and if we were using it for scientific/historical research and statistics.

The rights not to be subject to automated decision-making including profiling

You have the right to ask to:

- give you information about processing of your personal information;
- request human intervention or challenge decision where processing is done solely by automated processes;
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should.

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Notice, please email dpquery@broadleaffs.co.uk or telephone 0151 342 7700 or write to Broadleaf Financial Services Ltd, Broadleaf Chambers, Mount Avenue, Heswall, Wirral, CH60 4RH and we will do our utmost to put things right.

If you are still unhappy, you can complain to our Supervisory Authority. Their contact details are:

www.ico.org.uk