

## **MONTFORT INTERNATIONAL LTD PRIVACY POLICY**

*Important notice from Montfort*

Montfort International Ltd, Independent Financial Advisors, is authorised and regulated by the Financial Conduct Authority and is entered on the FCA register under reference 181199. We are permitted under the European Union Insurance Mediation Directive and Markets in Financial Instruments Directives to advise clients resident in the EU in relation to Insurance and Pension contracts.

We trade as Montfort International Ltd, Independent Financial Advisors, authorised and regulated by the Financial Conduct Authority, registration number 181199. Company registration number 3131722. Registered in England and Wales.

### **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 how we will utilise Your Personal Data and the various rights you have in relation to Your Personal Data.

Our privacy policy outlines how we collect and process Your Personal Data and it also provides certain information that is legally required and states your rights in relation to Your Personal Data.

This document, being a privacy policy, relates to personal information that identifies you as a natural person (whether you are an actual or potential customer, an individual who browses our website, or an individual outside our organisation with whom we interact). Collectively this information is referred to throughout this privacy policy as personal data or personal information and further detail of what this includes are set out in the rest of this privacy policy.

Your personal information and its security and confidentiality is very important to you as it is to us also. This is why we want you to know that your information will always be properly managed and protected. We ask that you take a few minutes and read this our privacy policy carefully as it explains how we may collect and use Your Personal Data. If you have any questions, please contact us.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments 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 in instances



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whereby we have legal right to such information we will retain records indefinitely.

## 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 assistance in relation to your investment, retirement and/or financial planning 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 dependents
- 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 investment, retirement products and/or financial planning needs and the terms and conditions relating to these.

## HOW WE USE YOUR PERSONAL DATA AND THE LAWFUL BASIS FOR DOING SO

When we speak with you about your investment, retirement products and/or financial planning needs and 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 have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided 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 financial services providers and our Compliance Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.



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On occasion, we will use Your personal data for contractual responsibilities we may 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.

## **WHAT INFORMATION DO WE HOLD ABOUT YOU AND WHERE DO WE OBTAIN THIS FROM?**

We will collect data mainly from you. This will normally result from you providing information during the course of our initial meetings, by way of a fact-finding document and/or conversations with you to establish your circumstances and needs and preferences relative to you. Information will also be provided to us verbally and in writing, including email.

The personal data that we collect about you may include the following information:

- Personal Data you provide to us in person, via our website or by telephone
- Personal Data you provide when you enquire about our services, or when you complete a factfind, provided by us, including information about what and/or who you want to invest with or plan to live
- General information about you, such as your name, address, contact details, and date of birth
- Financial details, such as your bank account and card details
- Information about your use of our website such as your IP address, which is a unique number identifying your computer, including personal data gathered using cookies.

In addition, we may obtain certain special categories of your data (such as medical information in connection with life insurance applications) and data about criminal convictions and this privacy policy specifically sets out how we may process these types of personal data.

We collect Your Personal Data from you as a processor when we construct financial planning solutions in order to deliver financial advice and when we make changes to your file records. This may also involve the collection of data from or about others who are associated with you and your financial planning such as other family members and emergency contacts. By giving us information about someone else for the purpose of providing our service to you, you confirm that you have their permission to do so and that you have shared this privacy policy with them.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. We use technology solutions to assist in the collection of Your Personal Data, for example software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to



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electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

By asking us to arrange financial planning for you where this involves passing information to us relating to children, you confirm to us that in doing so you are the responsible guardian of the child.

We also collect information from a variety of publicly available sources and third-party databases purposes of reducing financial crime such as money laundering as well as any other third-party databases where Your Personal Data may be held, provided such third parties have lawful bases on which to share such personal data with us.

## SHARING YOUR PERSONAL DATA

We may need to pass your personal data to other companies which may include:

- The insurers, intermediaries and third-party financial service providers that we use for the purpose of arranging and administering life insurance policies and investments resulting from our financial planning advice.
- Financial service providers
- Firms that provide administration and processing services to us or on our behalf under contract in order to complete activities such as, IT systems and administrative services and other activities set out in this Privacy Policy, as well as support activities such as finance and auditing services
- Other 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 but may not be limited to, our compliance advisers, product specialists, providers of legal services such as estate planners, tax specialists, etc. (in each case where we believe this to be required due to your particular circumstances).
- Organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities and other authorised bodies
- Other organisations where we have a duty to or are permitted to disclose your personal information by law, for example if we received a valid request from the police or other third-party organisation in the interest of preventing and detecting crime
- Fraud prevention agencies and operators of registers available to the financial services industry to check information and prevent fraud
- We may allow a potential acquirer or merger partner to review our databases, although we would restrict their



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use and disclosure of this information during any due diligence phase and we would direct them to treat the data confidentially.

In each case, Your Personal Data will only be shared for the purposes set out in this customer privacy policy, i.e. to progress your financial planning needs and to provide you with our professional services.

The information you share with us may be transferred by us or any of the types of firms or organisations we have noted above, to other countries in order for processing to take place, including locations outside of the UK and the European Union. We will only do so if there are adequate levels of protection in place as required by applicable data protection laws.

Please note that this sharing of Your Personal Data does not entitle such 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 Privacy Policy

#### **WHERE WE ARE RELYING ON A BASIS OTHER THAN CONSENT**

We may rely on one or more of the following legal bases when processing your personal data for the following purposes:

- Compliance with a legal obligation
- Contractual performance
- Vital interests
- Public interest or acting under official public authority
- Legitimate interests
- Data subjects' consent

#### **Special categories of data and criminal convictions**

We may also need to collect special categories of data from you, such as information about health, in order to perform our contractual obligations to you. The lawful basis on which we can do this is that the processing is necessary for reasons of obtaining life insurance cover for you and or your family protection. We may also collect information on criminal convictions which we may share with third parties. The lawful basis on which we can do this is that the processing is necessary for reasons of substantial public interest relating to issues such as Money Laundering Regulations.



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## **The basis upon which we will process certain parts of Your Personal Data**

Where you ask us to assist you with financial planning, and arrange your life, critical illness and income protection insurance, we will request Your Special Data and may ask you 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/investment providers in relation to financial planning that may meet your needs and to provide you with advice/guidance 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 special data and any Criminal Disclosures in the same way as your personal data generally, as set out in this privacy policy.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between intermediaries such as our firm, and insurance providers, to enable customers to secure the important life insurance protection that their needs require.

## **ACCESSING OUR WEBSITE AND COOKIES**

When you visit our websites, we may collect information from you, such as your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our internet traffic data and data regarding your browser type and computer. We may also use web usage information to create statistical data regarding the use of our website. We may then use or disclose that statistical data to others for marketing and strategic development purposes, but no individuals will be identified in such statistical data. Any personal data collected in this manner may be kept for up to 14 months.

We may use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website, but not on your computer. Pixel tags usually work together with cookies to help us to give you a more tailored service. We also use cookies and pixel tags in our email communication to personalise the email and track whether the email has been opened and whether the recipient has used any website links contained in the email communication. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).



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Internet browsers normally accept cookies by default, although it's possible to set a browser to reject cookies. We'll ask your permission before using any cookie that's not essential to the email or the use of the website. However, refusing to accept cookies may restrict your use of our website and/or delay or affect the way in which our website operates. You can find more information on cookies when you visit our website.

The open nature of the internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. While this is outside of our control, we do take the protection of your information very seriously and aim to apply appropriate levels of security at all times.

## YOUR RIGHTS

We will only store your data for as long as is necessary to comply with the requirements of your financial planning contract(s) and any legal obligations or lawful processing conditions that may exist as a result. You have a number of rights concerning the personal information we use, which you may ask us to observe. In some cases, even when you make a request concerning your personal information, we may not be required, or be able to carry out your request as this may result in us not being able to fulfil our legal and regulatory obligations under the lawful processing conditions under which we hold your data or because there is a minimum statutory period of time for which we have to keep your information. If this is the case, we'll let you know our reasons.

You can ask us to:

- Provide a copy of your personal information
- Correct or delete unnecessary or inaccurate personal information
- Restrict or to object to the use of your personal information at any time
- Object to any automated decision, including profiling which may have been used by insurers when underwriting your quotation. Where an automated decision has been made we will advise you of this and of your rights
- Ask us to further explain how we use Your Personal Data
- Provide Your Personal Data in a structured, commonly used and digitally -readable format and to have Your Personal Data transferred to another controller. This right only applies where our processing of Your Personal Data is automated and the processing took place initially with your consent or for the performance of a contract with you
- Where we rely on your consent to use your personal information, you can withdraw that consent at any time. Where your consent is withdrawn, your previous consent will remain valid in respect of our use of your



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information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you don't want us to contact you again

- Request to access the data Montfort holds on you, however, this will be subject to a small fee.

The above requests will be handled by Montfort's compliance team within 30 days of receipt.

You also have the right to make an enquiry or to complain to the Information Commissioner's Office (ICO) if you are unhappy with our use of your data, or if you think we have breached a legal requirement. Further details about the ICO are available at [www.ico.org.uk](http://www.ico.org.uk)

## HOW WE CONTACT YOU ABOUT OTHER PRODUCTS AND SERVICES

We may from time to time process Your Personal Data to let you know about similar products and services that may be of interest to you. This is because we value your custom and we pride ourselves in offering professional and tailored advice which meets your specific financial planning needs. This includes keeping you informed on the latest financial planning and industry information relating to the financial planning services we provide to you. Our lawful basis for processing Your Personal Data in this way is as is necessary to pursue the legitimate interests of our business unless we have otherwise obtained your consent to do so. We may contact you by post, telephone or email. You will be given the option to stop receiving any communications from us in this regard at any time however please note that this will not affect us contacting you about the servicing of products that you have specifically requested from us.

## HOW TO MAKE CONTACT WITH MONTFORT IN RELATION TO THE USE OF YOUR PERSONAL DATA

We are a processor of Your Personal Data as far the relevant data protection legislation is concerned. As a processor we use (or process) the personal data we hold about you in accordance with this privacy policy.

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also 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 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: [www.ico.org.uk/global/contact-us](http://www.ico.org.uk/global/contact-us) or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.



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Should it be necessary for you to contact us in relation to the use or processing of your personal data, then please refer to our contact details as set out below.

## **DATA PROTECTION CONTACT**

Our data protection team is represented by Montfort's compliance department, incorporating the compliance officer as Geraint Davies who is further supported by a compliance manager. Please send any data requests or queries by email to Geraint Davies and his team to **compliance@montfort-intl.com**.

*This privacy policy was last updated 10<sup>th</sup> July 2018.*



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