

## General Data Protection Regulation (GDPR)

As part of our arrangement with you, PMN Financial Management (Partnership) has certain obligations under privacy laws to explain how we use and process any personal information about you.

How the information is used, where it is stored, where it may be transferred and how you may view and amend such information.

You may be assured that we will treat all personal information as confidential and will not process it other than for a legitimate purpose.

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

We need to collect information about you to provide our services to you.

Without collecting your personal data, or special category personal data, we would be unable to fulfil our legal and regulatory obligations.

### **2. What information do we collect about you?**

We collect and process various personal data about you when you engage us for financial planning/advice, administration and investment management services.

Common examples of personal data which may be collected and used by us in our day to day activities include: ***your name; address; date of birth; telephone number and other contact details; your bank accounts; investment and pension details.***

It may also include special category personal data, such as sensitive data about your: ***physical or mental health; sex life or sexual orientation and racial or ethnic origin*** if this is necessary for the provision of our services in relation to completing life insurance questionnaires and obtaining medical reports.

### **3. How long do we keep hold of your information?**

Your personal data will not be held for longer than is required under the terms of our agreement for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods.

In any case, we must retain your personal data for as long as we are required to by law and regulation. 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 business interests as noted above.

### **4. Who might we share your information with?**

We may send your details to third parties we engage for compliance, accountancy, legal services as well as product and platform providers that we use to arrange and manage your financial assets.

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. This includes using password protection or encryption of data.

To fulfil our obligations in the prevention of money laundering and other financial crimes we may send your details to third party agencies for identity verification purposes.

However, we won't share your information with third parties for marketing purposes.

## **5. How can I access and amend the information you hold about me?**

You have the right to request a copy of your personal and special category personal data held by us and have any inaccurate information about you corrected.

If you wish to do so or notify a change in your details, please use the contact details noted below.

You have the right to ask us to transfer your personal data to another organisation for their use.

We will update and confirm the accuracy of your data at our regular review meetings (minimum annually).

## **6. Security and storage of information.**

Some of the personal data we collect from you will be stored on a secure server, protected through a combination of physical and electronic access controls, firewall technology and other security measures. We also hold information in paper files within locked cabinets.

All our computers are password protected and unauthorised access is prohibited. Your data can only be accessed by authorised PMN employees.

## **7. How to request that PMN cease processing my personal data?**

If you wish to withdraw your consent to processing your personal data, please contact PMN on our contact details noted below.

## **8. Marketing**

PMN does not engage in direct / email marketing to its clients in any form.

## **9. International Data Transfers**

The data we collect from you may be transferred to and stored at a destination outside the European Economic Area (EEA). It may also be processed by our service providers operating outside the EEA.

We take steps to ensure that, in the event that your information is transferred outside the EEA by our service providers, appropriate measures and controls are in place to protect your personal information in accordance with applicable data protection laws and regulations in the UK.

## 10. Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our 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.

## 11. Other websites

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

## 12. Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on our web page or inform you of any changes when they occur. This privacy policy was last updated on 11<sup>th</sup> May 2018.

## 13. How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

by emailing us at: [info@pnmfinancial.co.uk](mailto:info@pnmfinancial.co.uk)

or writing to us at: PMN Financial Management  
B4 Endeavour Place  
11 Coxbridge Business Park  
Alton Road  
Farnham  
Surrey  
GU10 5EH

## 14. 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 number: 0303 123 1113