



## **Privacy & Cookies Notice**

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 planning/financial advice/mortgage advice/investment management services**. 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.

### **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 would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we will 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.

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 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, **such as passwords and/or secure communication through two-way systems.**

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.

### **For how long will we keep your information?**

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements, which means that we must retain data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us. In any case, we will not keep your data for longer than 10 years after our regulatory obligations to you have ceased.

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.

### **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 would 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 would like to send you information about our products and services which may be of interest to you. If you have 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

When we provide services, we want to make them easy, useful and reliable. Where services are delivered on the internet, this sometimes involves placing small amounts of information on your device, for example, computer or mobile phone. These include small files known as cookies. They cannot be used to identify you personally.

These pieces of information are used to improve services for you through, for example:

- enabling a service to recognise your device so you don't have to give the same information several times during one task
- recognising that you may already have given a username and password so you don't need to do it for every web page requested
- measuring how many people are using services, so they can be made easier to use and there's enough capacity to ensure they are fast

There are two types of cookie you may encounter when using the RTFP website:

**First party cookies:** these are our own cookies, controlled by us and used to provide information about usage of our site. They are essential for the operation of the site.

**Third party cookies:** these are cookies found in other companies' internet tools which we are using to enhance our site, for example Facebook or Twitter have their own cookies, which are controlled by them. If you wish to find out more about cookies utilised by these organisations please access their websites for further information.

### How to control and delete cookies

We will not use cookies to collect personally identifiable information about you.

However, if you wish to restrict or block the cookies which are set by our website, or indeed any other website, you can do this through your browser settings. The 'Help' function within your browser should tell you how.

Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org) which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your machine as well as more general information about cookies.

Please be aware that restricting cookies may impact on the functionality of our website.

If you wish to view your cookie code, just click on a cookie to open it. You'll see a short string of text and numbers. The numbers are your identification card, which can only be seen by the server that gave you the cookie.

For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

To opt-out of third-parties collecting any data regarding your interaction on our website, please refer to their websites for further information.

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 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.

### **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

0303 123 1113 (local rate)

### **Changes to our privacy policy**

We keep our privacy policy under regular review and we will inform you of any changes when they occur. This privacy policy was last updated on 03/05/18.

### **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you: by email: [gdp@rtfp.co.uk](mailto:gdp@rtfp.co.uk)

Or write to us: Valerie Kiertzner

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