

# Baxter Pearce

## Financial Consultants Ltd

### Privacy Notice and Consent Form

Baxter Pearce Financial Consultants Limited is an appointed representative of Lyncombe Consultants Ltd which is authorised and regulated by the Financial Conduct Authority. 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 and financial advice. 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.

#### 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 will provide a copy of this privacy notice for them or 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 we collect about you is essential for us to be able to carry out the services that you require from us. Without collecting your personal data we would be unable to fulfil our legal and regulatory obligations.

To provide our services properly we will need to collect information about your personal and financial circumstances. We take your privacy seriously and will only use your personal information to deliver our services.

**Special categories of personal data:** there are certain categories of personal data that are sensitive by nature. The categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health. Depending on the nature of the products and services that you engage us for we may need to obtain your sensitive personal data particularly in relation to health. Our policy is that should we require any special category of personal data we will only gather this with your explicit consent.

#### 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. Processing of your personal data is necessary for the performance of our contract for services with you and in meeting our obligations to prevent money laundering or terrorist financing. Generally this is the lawful basis on which we intend to rely for the processing of your data. Our policy is to gather and process only that personal data which is necessary for us to conduct our services appropriately with you and to prevent money laundering or terrorist financing.

## 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.

We will not share your information for marketing purposes with any other companies.

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.

We may engage the services of third party providers of professional services in order to enhance the service we provide to you. These parties may also need to process your personal data in the performance of their contract with us. Your personal information may be transferred electronically (e.g. by email or over the internet) and we, or any relevant third party, may contact you in future by what we believe to be the most appropriate means of communication at the time (e.g. telephone/ email /letter etc.).

The organisations to which we may pass your details also have their own obligations to deal with your personal information appropriately. Sometimes a product or service may be administered from a country outside Europe. If this is the case, the firm must put a contract in place to ensure that your information is adequately protected.

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.

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.

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

During the course of our relationship with you we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship.

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

- Five years for investment business
- Indefinitely for pension transfers and opt-out business
- Three years for insurance 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 keep your personal data for no longer than 5 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.

## **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**

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.

## **What can you do if you are unhappy with how your personal data is processed?**

You have a right to lodge a complaint with the supervisory authority for data protection. 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 25<sup>th</sup> May 2018.

## **How to contact us**

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

by email at [johnwilson@bpfc.co.uk](mailto:johnwilson@bpfc.co.uk)

Or write to us at:

Baxter Pearse Financial Consultants Ltd  
YBN  
7&8 Delta Bank Road  
Metro Riverside Park  
Gateshead  
NE11 9DJ

**Consent**

**Sensitive personal data**

The primary basis on which we intend to process your personal data is for the performance of our contract with you. In the case where we need to process special category (sensitive) data as described above we require your consent by indicating your agreement to the following statement:

**I / we consent to the processing of sensitive personal data as far as it is necessary for the services I / we require from Baxter Pearse Financial Consultants Limited**

**Client name** ..... **Client name** .....

**Signature** ..... **Signature** .....

**Date** .....

Please note that you may withdraw this consent at any time by notifying us at our main business address.

We may also engage the services of third party providers of professional services in order to enhance the service we provide to you. These parties may also need to process your personal data in the performance of their contract with us. If you wish to know the names of these third parties please contact us for further information.

**Marketing**

From time to time we may wish to contact you to offer additional products or services which may be of interest to you. In order to do this we require your consent by agreeing to one or all of the options:

**I / we consent to be contacted for marketing purposes by:**

**Email Telephone Text message Post**

**Client name** ..... **Client name** .....

**Signature** ..... **Signature** .....

**Date** .....

Please note that you may withdraw this consent at any time by notifying us at our main business address.