Privacy notice

We take your privacy seriously and are committed to handling your personal information lawfully, fairly and transparently under the UK GDPR and the Data Protection Act 2018.

This privacy notice explains how we collect, use, share, store and protect your personal information and how you can make a complaint with us about how we handle your personal information.

Contact details

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

1 Aske Stables, Aske, Richmond, DL10 5HG, 01748 889440, info@ethicalmoney.org

What personal information we collect

We will collect or use your personal information when you engage us for financial advice. This information may include:

- Personal identifiers – details that help us to confirm who you are, such as:
  - Your name, date of birth, address, contact details
  - National insurance number
  - Identification documents (passport, driving licence)

- Financial and professional information – Information that helps us understand your financial position such as:
  - Your income and regular spending
  - Details of your assets, liabilities, pensions & investments
  - Tax information
  - Employment information

We may also need to use **special category information**, but only, where relevant and with your explicit consent.

- Communications – to keep accurate records and meet regulatory requirements we may record:
  - Emails, notes of telephone call, meeting notes and letters
  - Records required to meet the FCA's requirements

How we collect your personal information

We collect personal information during meetings, calls, emails, letters and when completing online forms.

How we use your personal information

We use your personal information to help us deliver the services you've asked for. This may include:

- Understanding your financial situation so we can give you the right advice
- Providing recommendations that meet FCA rules on suitability
- Applying for or arranging financial products on your behalf
- Carrying out identity, fraud and anti-money-laundering checks

- Keeping accurate and compliant records
- Communicating with you about your services, plans, policies or investments
- Investigating and responding to complaints

Who we share your personal information with

To provide you with our services, we sometimes need to share your personal information with trusted third parties. These may include:

- **Financial product providers** such as insurers, investment platforms and pension providers
- **Compliance consultants, auditors and professional advisers** who help us meet regulatory requirements
- **Discretionary investment managers** where relevant to your service
- **IT service providers and secure cloud platforms** that support our systems
- **Regulators and authorities** such as the FCA, HMRC and the Financial Ombudsman Service and, where appropriate, to support fraud prevention or safeguarding
- **Credit reference agencies**, but only when necessary

We **never** sell your personal information to anyone.

Your data protection rights

You have several rights under data protection law. This helps you understand and control how your personal information is used.

- **Right to be informed** - You can ask us to explain how we collect, use, share, and store your personal information.
- **Right of access** - You can request a copy of the personal information we hold about you, along with details of how we use it.
- **Right to rectification** - If you think any of your information is wrong or incomplete, you can ask us to correct or update it.
- **Right to erasure** - In some situations, you can ask us to delete your personal information.
- **Right to restrict processing** - You can ask us to limit how we use your information in certain circumstances.
- **Right to object** - You can object to us using your personal information, for example for direct marketing.
- **Right to data portability -** You can ask us to send your personal information to you, or directly to another organisation, in a structured, commonly used electronic format.
- **Rights related to automated decision-making and profiling -** If a significant decision about you is ever made without meaningful human involvement, you have the right to request human review, ask for an explanation and challenge the decision.

We will respond to any request you make about your data protection rights within one month.

To make a request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for processing your personal information

UK data protection law requires us to have a valid legal reason—called a *'lawful basis'*—for collecting and using your personal information. The UK GDPR sets out the different lawful bases.

The lawful basis we rely on may affect which data protection rights apply to you. Below, we've listed your rights in brief.

You can read more about your data protection rights, including any exceptions, on the ICO's website: For the public | ICO

For financial planning and advice, we rely on the following lawful bases:

Contractual obligations

This is the main reason we use your personal information. We need certain details from you so we can deliver the services we've agreed to provide.

Legal obligations

Sometimes the law requires us to collect and use specific information. For example, UK anti-money-laundering laws require us to verify your identity.

Consent

In some situations, we may need your explicit consent to use special category information (listed in the Consent to process special category data form). We will only obtain this when relevant and always explain why we need this information and ask for your clear agreement before using it.

If we rely on your consent, you can withdraw it at any time.

Legitimate interests

We may keep certain personal information because we have a legitimate business reason to do so, for example, to check the suitability of our services, respond to any complaints in the future, or to meet the requirements of our Professional Indemnity insurer.

Recognised legitimate interest

In limited cases, we may rely on recognised legitimate interests for specific public-interest purposes, such as fraud prevention or safeguarding. This is narrowly defined and unlikely to apply to most of our routine services, but where used, we will ensure the processing is necessary and appropriate.

How long we keep your personal information

We keep the personal information we need to provide our services to you, and we take reasonable steps to make sure it stays accurate and up to date. Some information must be kept for minimum periods set by our regulator, the Financial Conduct Authority (FCA):

- Investment business - 5 years
- Insurance business - 3 years

We also have to keep certain records to meet UK anti-money laundering requirements. These include identity verification documents and other information used to confirm your identity.

- We will keep this information for at least 5 years after our relationship with you ends.
- Some records relating to transactions may be kept for longer where this is necessary to meet legal, regulatory or business requirements.

Because these are legal and regulatory requirements, we cannot delete your information before these minimum time periods have passed.

We may keep your personal information for longer if we have a legitimate business reason to do so, but we will not keep personal information for longer than necessary and will assess appropriate retention periods based on the purpose for which the information is held.

You can ask us to delete your personal information. We will do so unless we are required to keep it for legal or legitimate business reasons.

We regularly review the information we hold to ensure it is not kept for longer than necessary.

Information about connected individuals

We may need to collect personal information about your close family members and dependents to provide our service(s) effectively. If this is the case, you are responsible for ensuring you have their consent to share this information with us. If you act as a trustee or attorney, we may also need information about the relevant beneficiaries or donor(s). We will give them a copy of this privacy notice or ask you to pass it on if that's more appropriate.

Using cookies

We use cookies to:

- Understand how visitors use our website
- Help us create reports and improve our site
- Where consent is not required, you can still control or opt out of cookies through your browser settings at any time.

If you'd like to learn more about cookies, you can visit: http://www.allaboutcookies.org/

You can change your browser settings to block or delete cookies at any time. The website above explains how to do this. Please note that if you choose to block cookies, some parts of our website may not work as expected.

Other websites

Our website may include links to other sites. Please remember that this privacy notice only covers our website, so we recommend checking the privacy policies of any other sites you visit.

How to make a complaint

If you have any concerns about how we use your personal information, you have the right to raise a data protection complaint with us using the contact details at the top of this privacy notice. You do not need to follow a specific process or use particular wording.

You can raise a complaint through any of our usual contact channels, including email, telephone or post. We will:

- Acknowledge your complaint promptly and at least within 30 days of receiving it
- Investigate and respond without undue delay
- Keep you informed where appropriate

Further details of our complaints process are available on request.

If you are not satisfied with our response, you have the right to escalate your complaint to the Information Commissioner's Office (ICO).

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint