



Thompson & Richardson (Financial Services) Lincoln Limited

Privacy Notice

January 2022

Privacy Notice

Thompson & Richardson (Financial Services) Lincoln Limited,
One + One,

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 or mortgage 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.

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. We'll use your information collected from the website to personalise your repeat visits to the site.

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 and how will we use the information about you?

Purpose/Activity	Type of data	Lawful basis for processing
1. Sending you a newsletter via email by using the 'Sign up to our newsletter' function on the Website 2. Providing your name, telephone number and email address in the 'Request a callback' function on the Website 3. When you contact us via email by clicking on the email address links or 'get in touch' links on the Website	Identity Contact Profile Marketing and Communications	Consent
To discharge our duties as your adviser	All information necessary to act as your financial adviser, including, but not limited to: Identity Contact Profile Financial Employment	Performance of contract

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to complete a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p> <p>Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant Website content to you and measure or understand the effectiveness of the content we serve to you</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p> <p>Marketing and Communications</p> <p>Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences</p>	<p>Technical</p> <p>Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about</p>	<p>Identity</p> <p>Contact</p>	<p>Necessary for our legitimate interests (to develop our</p>

goods or services that may be of interest to you	Technical Usage Profile	products/services and grow our business)
--	-------------------------------	--

Who might we share your information with?

If you agree, we'll pass on your personal information to our group of companies so that they may offer you their products and services.

We won't share your information for marketing purposes with companies outside our group of companies/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.

Where third parties are involved in processing your data we'll 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'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit. We shall take care to ensure the information we send is either password protected or encrypted before it is sent.

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'll retain personal data which is necessary to provide services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

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

- Five years for investment business
- Three years for mortgage 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's in our legitimate interests to do so. In any case, we shall not retain your personal data for longer than is absolutely necessary, however given the open-ended nature of our commitment and relationship to you, we cannot provide an absolute timescale.

You have the right to request deletion of your personal data. We'll 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'd 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.

Automated decision making and profiling

If you use our One + One Service your personal information will be gathered through the information that you input onto the system. Your data is collected in order for us to carry out the service for which you engage us. If you're unsure about the outcome of the automated process you can contact us to discuss or to challenge the outcome.

We take measures to ensure the security of your data which will be protected by password and held on secure servers. We don't use any special category data (such as data about your health) in the automated process unless it's strictly necessary to deliver our service and we have obtained your explicit consent to do so.

We regularly check our systems for accuracy and bias and feed any changes back into the design process.

Marketing

We'd like to send you information about our products and services and those of other companies in our group which may be of interest to you. If you've 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 or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by email or post. The contact details are detailed under the heading "How to contact us"

Cookies

We use cookies to track visitor use of the 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.

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'll place any updates on this web page. This privacy policy was last updated on 25th January 2022.

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 info@trfs.co.uk

Or write to us at Ambition House, 3 Oakwood Road, Lincoln. LN6 3LH. Tel: 01522 513191

Signed	Andy Dyson, Managing Director
Policy Date	January 2022
Version	2
Source Basis	Threesixty and Yardstick
Original Creation Date	April 2018
Previous Review Dates	April 2018, Threesixty Aug 21 (no changes), January 2022.
Next Review Date	January 2023.
TOMS	12.11