

# Punter Southall Financial Management Privacy Policy

Punter Southall Financial Management Limited (PSFM, we, us or our) knows that you care how your information is used and shared, and we appreciate your trust in us to do that carefully and sensibly. Your privacy is important to us and we are committed to protecting and respecting your privacy.

This Privacy Policy explains how we use your personal data. This is information about you that we may collect directly from you, or it might be information that is provided to us about you by your Policy Providers or other sources at your direction. Your personal data will be collected by us when you use our website, or when you complete our opening paperwork to become a client using our services.

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## Who we are

We are Punter Southall Financial Management and we are the Controller. We are part of the Punter Southall Group and our business contact details are:

Registered office: 11 Strand, London WC2N 5HR

Telephone: 020 3327 5000

Email: [marketing@psfm.com](mailto:marketing@psfm.com)

Website: [www.psfm.com](http://www.psfm.com)

LinkedIn: <https://www.linkedin.com/company/psfm-ltd/>

The contact details of our Data Protection Officer are:

Name: Richard Garmon-Jones

Address: 11 Strand, London WC2N 5HR

Telephone: 020 3327 5182

Email: [data.protection@puntersouthallgroup.com](mailto:data.protection@puntersouthallgroup.com)

## Personal data we may collect

The specific types of personal data we may collect and use about you will depend upon the extent to which you use our website facilities, or our services.

The types of information we collect directly from you are:

- ) Personal and financial information that is collected when you complete our new client documentation and engage our services. Information such as your contact details, date of birth, residency status, employment and tax status, your national insurance number, passport details as proof of identity and utility bill as proof of address.
- ) Important information that helps us to assess the suitability of our services for your needs such as, details relating to your assets and liabilities and your financial goals and time horizon. In addition to this we also process your answers to our attitude to investment risk questionnaire in order to help us to understand your attitude to taking financial risks. This helps us to understand your needs and financial goals, and builds a profile that assists us in tailoring our services for your needs. This takes place at the beginning of the relationship and periodically whilst you remain a client.
- ) Information on the source of your wealth and the source of the funds you have, in order to be able to receive our services and for regulatory reasons.
- ) We will collect information that helps us to contact you such as your name, email address and telephone number, when you make enquiries or request information on our services through our website. We will retain information in respect of the services for which you request information.
- ) When using our website we will capture the information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further information on our services. You may choose to email [marketing@psfm.com](mailto:marketing@psfm.com) requesting further information on our services or, if you are an existing client, you may request further information from your Financial Planning team.
- ) We may also ask you for information regarding your user experience such as details on your browsing history when you report a problem using our website.
- ) If you contact us using any of the above methods, we may keep a record of that correspondence.

The types of information we collect from you automatically are:

- ) Details of your visits to our website including, but not limited to, traffic data, location data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

## Aggregate/Anonymous Data

We may aggregate and/or anonymise any personal data collected through the facilities, services or products offered so that such information can no longer be linked to you or your device. We may use this information for any purpose and may share this data with our third parties.

Please note that we need certain types of information so that we can provide the website facilities and services to you. If you do not provide us with such information, you may no longer be able to access or use our services.

## Personal data we obtain from third parties

We obtain information about you from third parties when we carry out Anti Money Laundering 'AML' Checks using credit and fraud prevention agencies. This will leave a 'soft footprint' on your credit history.

The data we obtain from the credit reference agency is collated by searching the records of multiple sources and is used to help us to assess the strength of the information you have supplied before we can accept you as a client. Such as:

- ) Identity verification
- ) Residential address verification

To assist us in establishing your investment goals and assessing the suitability of our services we use the results from your completed Attitude to Risk Questionnaire and our Fact Find document.

## Why we collect and use your personal data

We, or our data processors, use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities, services or products you use. In particular, we collect your information for the following purposes:

- ) To carry out our obligations arising from any contracts entered into between you and us.
- ) To allow you to participate in interactive features of our service, when you choose to do so.
- ) To notify you about changes to our service.
- ) To provide you with information, products or services that you request from us or that we feel may interest you, where you have consented to be contacted for such purposes.

The legal basis for using your information are as follows:

- ) Where you make an enquiry, ask a question or request information on a service or product, agree to marketing communications or report a

problem, we will require your consent or rely on other lawful basis of processing before we use your information such as

- o performance of a contract – to fulfil our obligations in line with our Terms and Conditions
  - o compliance with a legal obligation to fulfil our obligations with our Regulator (FCA)
- ) Where you have requested a service or product, the use of your information is necessary for the performance of the contract we've entered into with you for the provision of those services or products. Where special categories of information is required in the performance of the contract we will ask for your explicit consent prior to its collection;
- ) Where we provide you with the website facilities, services or products you've requested, use of your information is necessary to perform our obligations under the terms of any contract we have with you, and
- ) Where we collect your information automatically or you respond to a survey we use your information for our legitimate business interests. This is to provide security for our website, operate our business and provide our services, ensure safe environments for our staff and visitors to our offices, to comply with legal requirements and defend our legal rights, prevent fraud and to know you, our customer to whom we are providing the facilities, services.

## Who we share your personal data with

Organisation/Entity	Reason for sharing
Credit and fraud prevention agencies	<p>PSFM performs electronic searches using SmartSearch which is one of the UK's credit and fraud prevention agencies. SmartSearch accesses records maintained by Experian, EQUIFAX and DOW JONES. The purpose of such checks is to verify the strength of the information you have provided to us.</p> <p>Personal data shared with SmartSearch is as follows</p> <ul style="list-style-type: none"> <li>) Full name and date of birth</li> <li>) Residential address</li> <li>) Passport number and expiry date or driving license details</li> <li>) National Insurance Number</li> </ul> <p>You can follow the link below to find out more about the role of the credit reference agencies  <a href="http://www.experian.co.uk/downloads/consumer/creditRefAgencyExplained.pdf">http://www.experian.co.uk/downloads/consumer/creditRefAgencyExplained.pdf</a></p>
Appointed Service providers	PSFM uses a number of service providers; Client Relationship Management ('CRM' our database) system Auditors, document disposal company and Professional Advisers
FCA and other Regulatory bodies	Transaction reporting for the purposes of meeting our regulatory obligations and the monitoring of market abuse
pension, investment, and protection providers	Your Pension providers, investment providers, insurance providers at your instruction

By court order	If required to make a disclosure by a court of law or relevant market rules or codes of practice
In the event of Merger or acquisition of PSFM or the Punter Southall Group	We would be required to share information in respect of our book of business with any potential buyer of the business or the group

### How long we will retain your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, as set out in this Privacy Policy, and for as long as we are required to keep it by law. In order to ensure we meet our obligations, we have a designated data retention policy that relates to, but is not limited to, all physical documents, electronic versions of documents, and data held in systems relating to PSFM clients and indicates when personal information should be disposed of. PSFM securely disposes of personal data when it is no longer needed.

### Cookies and similar technologies

When we collect information automatically, as stated above, we and our service providers use internet server logs, cookies, tags, Software Development Kit, tracking pixels and other similar tracking technologies. We use these technologies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences. As we adopt additional technologies, we may also gather information through other methods.

We also use cookies to measure the effectiveness of our marketing communications, for example they tell us if you have opened a particular marketing email.

For more information on the cookies we use, the purposes for which we use them and how you can control them please refer to our Cookies Policy.

### Marketing and research

You have choices when it comes to receiving marketing communications and taking part in market research. We will send you relevant news about our products and services in a number of ways including by email, but only if you

have previously agreed to receive these marketing communications. You can unsubscribe at any time using the Unsubscribe button on any of our emails, or by contacting us at [marketing@psfm.com](mailto:marketing@psfm.com).

We would also like to hear your views to help us to improve our services and products, so we may contact you for market research purposes. You always have the choice about whether to take part in our any of our surveys or market research.

## Applications for employment

Our website contains a Careers page that links to a website where you can apply for employment at PSFM.

This recruitment website is administered by Jobtrain, a Punter Southall Group (PSG) service provider. The Jobtrain website collects personal data such as your personal details, contact information and work history and qualifications. It also uses cookies and other means of collecting information, which is only used to enable you to complete your application and for analytics purposes.

Jobtrain is permitted to collect, use and share your information only as necessary to perform the functions that PSG directs it to perform. Any information that PSFM collect from Jobtrain in connection with the recruitment website is handled consistent with this Privacy Policy. PSFM will use and share your information only for employment purposes, such as communicating with you about or evaluating you for a job opportunity or where sharing is required by law.

## How to access and control your personal data - your rights

You have certain rights with respect to your information which are summarised below. Some of the rights are complex therefore, not all details are included in the summary:

- ) Right to be informed: you can print a copy of this Privacy Policy by clicking the printer icon at the top of this page; or by requesting a printed version from your Financial Planning Team
- ) Right of access: you can ask for copies of all the information that we process about you free of charge;
- ) Right to rectification: you can ask to have any inaccurate information we hold about you corrected;
- ) Right to erasure: you can ask for the information held about you to be erased (subject to certain criteria);
- ) Right to restriction of processing: you can ask us to stop processing your information (under certain circumstances);
- ) Right to data portability: you can, under certain circumstances, request that we transmit your personal information to another provider of services;

- J Right to object: you can object to your information being processed if our legal basis for processing your information is based on “legitimate interests”. To check whether we use your information for “legitimate interests” see the section “Why we collect and use your personal data” above.

If you would like to exercise any of your rights mentioned above, you can do so by writing or emailing our Data Protection Officer detailed above.

### Your right to withdraw consent

Where you have provided consent for us to process your information, you can withdraw your consent at any time. Please note: withdrawal will not affect the lawfulness of processing prior to you withdrawing your consent.

You can withdraw your consent to our use of your data by contacting our Data Protection Officer detailed above.

You can withdraw your consent to receive our marketing emails by using the unsubscribe button on our marketing emails or by notifying us by email [marketing@psfm.com](mailto:marketing@psfm.com).

### Your right to make a complaint

If you have a complaint about our financial advice service, we’d like to resolve this with you directly if possible.

Please contact in the first instance our Compliance Team:

In writing: The Compliance Officer, PSFM Limited, 11 Strand, London WC2N 5HR

By phone: Telephone: 020 3327 5000

If ultimately we cannot settle your complaint about our service, you may be entitled to refer it to the Financial Ombudsman Service.

By phone: 0300 123 9 123 or 0800 023 4567

Website help page: <http://www.financial-ombudsman.org.uk/consumer/complaints.htm>

If you have a complaint about the way we process your personal data or think that we have not complied with your data privacy rights, this is also something we’d like to resolve with you directly if possible.

Please contact in the first instance our Data Protection Officer:

Mr. Richard Garmon-Jones, PSFM Limited, 11 Strand, London WC2N 5HR

By phone: 020 3327 5182

By email: [data.protection@puntersouthallgroup.com](mailto:data.protection@puntersouthallgroup.com)

If ultimately we can't settle your complaint about data privacy, you can go on to refer it to the ICO:

The Information Commissioners Office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

By phone: 0303 123 1113 or 01625 545 745

Fax 01625 524510

Website: [www.ico.org.uk](http://www.ico.org.uk)

Changes to our Privacy Policy

You will be informed of changes to this policy by notification on our website.