



MT Financial
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Customer Privacy Notice

Why should you read this document?

MT Financial Management Ltd is committed to protecting and respecting your privacy whilst being transparent with you regarding how we process your data. We are a “data controller” which means we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this notice. It is important that you read this notice, so you are aware of how and why we use your personal data.

We may make changes to this notice from time to time and will notify you if any such changes are significant.

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (**Your Personal Data**).

The kind of Personal Data we hold about you

Your Personal Data means any information that describes or relates to your personal circumstances. It does not include data where the identity has been removed (anonymous data).

In the context of providing you with assistance in relation to your Investment and/or insurance requirements Your Personal Data may include:

- Personal contact details such as name, title, addresses, telephone numbers and email addresses
- Date of birth
- Gender
- Personal circumstance such as marital status and dependants
- Next of kin
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Financial circumstances & current policies
- Copy of driving licence, passport, payslips, utility bills and bank statements
- Photographs

Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

We may also collect, store and use the following "special categories" of more sensitive personal information (**Your Special Data**):

- Information about your health, including any medical condition, health and sickness records
- If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.
- The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to investment and insurance. You will provide information to us verbally and in writing, including email. We will also collect data about you and your family from other people such as providers who you hold policies with.

Where you are referred to us by an independent introducer, they will ask for your agreement to send this information to us to provide you with advice and guidance.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll.

If we use technology solutions to assist in the collection of Your Personal Data, for example software that is able to verify your credit status, we will only do this if we have consent from you for us or our nominated processor to access your information in this manner.

With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

How is your Personal Data used and on what lawful basis?

When we speak with you about your investment and/or insurance requirements we do so on the basis that both parties are entering a contract for the supply of services.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances, where:

- we need to perform the contract we have entered into with you
- we need to comply with a legal obligation
- we have your consent

Primarily, we use your data and data about your family's circumstances to provide financial advice to you and complete transactions on your behalf. We analyse and assess your data to maintain and develop our relationship with you and meet our contractual obligations to you as detailed in our client agreement.

Who is your information shared with?

- **Other professional service providers:** depending on the instructions we receive from you, we may pass your data to other professionals to enable us to provide advice most suited to your circumstances. We will always notify you if we are going to share your information in this way and these professionals would all be based within the UK.

Usually, this would be referrals to accountants, solicitors, tax advisers and sometimes to specialist advisers in the financial and insurance industry where you may benefit from the expertise of such third parties. We, and any third-party specialist advisers to whom we introduce you, will pass your data to the relevant organisations if you agree to purchase or amend policies and products.

- **The Financial Conduct Authority:** We may be required to share your data with our regulator, the Financial Conduct Authority, or the Financial Ombudsman and other third parties including our auditors or insurers.
- **ID authentication agencies:** We will make checks with third party agencies to authenticate and verify your identity such as SmartSearch. These checks will also be applied to sanction lists. Any personal data obtained for the purposes of meeting with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 will only be processed for the purposes of preventing money laundering or terrorist financing, unless the use of the data is permitted by or under another enactment other than those regulations, or otherwise where consent has been obtained from you.
- **Insurance / mortgage providers:** We also make checks with organisations with which you have policies of insurance and investments and with your mortgage provider. These checks are to help us with our legal obligations and to ensure that we provide you with advice that suits your circumstances. The scope and extent of the gathering of information from third parties depends on what type of service you are taking from us.
- **Purchasers / investors:** We may share your information with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets or who are stakeholders or investors in our business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with data protection laws. We do not allow our third –party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

If you fail to provide Personal Data

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with accurate financial advice), or we may be prevented from complying with our legal obligations (such as under the Money Laundering Regulations).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

What happens to Your Personal Data when it is disclosed to us?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instruction and they are subject to a duty of confidentiality.

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit Your Personal Data to Product Providers and/or Insurance Product providers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Additionally, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from insurance providers and our Compliance Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where we give you a recommendation, your information, along with supporting documentation will be retained indefinitely.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your rights in relation to Your Personal Data

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

How to make contact with our Firm in relation to the use of Your Personal Data

If we feel we have a legal right not to deal with your request or to action it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you would like to access your data or ask for your information to be updated, restricted or deleted or raise a general query or concern about the use of your personal information, you should contact the Data Protection Officer at the address below who will deal with your request promptly.

Mark Hildred, Data Protection Officer, MT Financial Management Ltd

In writing to: The Merchants House, Market Place, Spalding, Lincolnshire, PE11 1SU

By telephone: 01775 717220

If you continue to have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at : ico.org.uk/concerns/ or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.