

## How your personal information is used by GDA Financial Partners

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

*Italicised* words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

### Who we are

We are independent financial advisers who aim to provide impartial and independent financial advice relating to individuals needs and objectives. We advise on investments, Pensions, Protection and Mortgages in a friendly and relaxed atmosphere. Our independent status and wealth of experience allows us to offer a wide range of financial products and services tailor made to suit our client’s needs.

GDA Financial Partners collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

When we mention "we", "us" or "our" we are referring to GDA Financial Partners.

We are a Limited Liability Partnership registered in England and Wales (company number OC366488) whose registered office is at The Retreat, 406 Roding Lane South, Woodford Green, Essex, IG8 8EY, UK. GDA Financial Partners is authorised and regulated by the Financial Conduct Authority. GDA Financial Partners Financial Services Register number is 565732.

### The personal data we collect and use

Type of personal information	Description
Financial	Your financial position, status and history.
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality, education and where you fit into general social or income groupings.
Transactional	Details about payments to and from your accounts, and insurance claims you make.
Contractual	Details about the products or services we provide to you.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails, and conversations between us.
Social Relationships	Your family, friends, and other relationships. Details of your dependents and/or beneficiaries

	under a policy (if you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.)
Open Data and Public Records	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence, or birth certificate.
Special types of data	The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so: <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic and bio-metric data</li> <li>• Health data including gender</li> <li>• Criminal convictions and offences</li> </ul>
Consents	Any permissions, consents, or preferences that you give us.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.

### How we use your personal data

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so.

What we use your personal information for	Our reasons
To provide advice or guidance about products and services you have asked us about.	Your consent. Fulfilling contracts.
To manage our relationship with you or your business.	Our legitimate interests. Our legal duty.
To deliver products and services.	Fulfilling contracts.
To make and manage customer payments.	Our legitimate interests. Our legal duty.
To manage fees, charges	

<p>To detect, investigate, report, and seek to prevent financial crime.</p> <p>To manage risk for <i>us</i> and <i>our</i> customers.</p> <p>To obey laws and regulations that apply to <i>us</i>.</p> <p>To respond to complaints and seek to resolve them.</p>	<p>Fulfilling contracts.</p> <p><i>Our</i> legitimate interests.</p> <p><i>Our</i> legal duty.</p>
<p>To run <i>our</i> business in an efficient and proper way. This includes managing <i>our</i> financial position, business capability, planning, communications, corporate governance, and audit.</p>	<p><i>Our</i> legitimate interests.</p> <p><i>Our</i> legal duty.</p>
<p>To exercise <i>our</i> rights set out in agreements or contracts.</p>	<p>Fulfilling contracts.</p>

### Where we collect personal information from

- When you approach *us* for advice in person or on the phone.
- *Lenders* and/or *product providers*.
- In emails and letters.
- In insurance claims or other documents.
- In financial reviews and interviews.
- Identification and verification checking agencies.
- Data *we* collect when you use *our* services.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to *our* personal finance portal service.
- Companies that introduce you to *us*.
- Public information sources such as Companies House.
- Agents working on *our* behalf.
- Government and law enforcement agencies.

### Who we share your personal information with

*We* ensure that any party with whom *we* share your personal information complies with the GDPR obligations in order to ensure that your data is kept safe and private. This includes product provider platforms and internal systems utilised by GDA Financial Partners.

*We* may share your personal information with:

- Agents and advisers who *we* use to help run your accounts and services.
- HM Revenue & Customs, regulators and other authorities.
- UK Financial Services Compensation Scheme.
- Any party linked with you or your business's product or service.
- Companies *we* have a joint venture or agreement to co-operate with.
- Organisations that introduce you to *us*.
- Companies that *we* introduce you to.
- Price comparison websites and similar companies that offer ways to research and apply for financial products and services.

- Companies you ask *us* to share your data with.
- We may need to share your personal information with other organisations to provide you with the product or service you have chosen:
  - If you apply for insurance through *us*, we may pass your personal or business details to the insurer, and onto any reinsurers.
  - If you make an insurance claim, information you give to *us* or the insurer may be put on a register of claims. This will be shared with other insurers.
  - If you have a secured loan or mortgage with *us*, we may share information with other lenders who also hold a charge on the property.

## **Marketing**

We do not use your personal information to directly market products and services.

You will still receive statements, and other important information such as changes to your existing products and services.

## **Whether information has to be provided by you, and if so why**

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for *us* to provide you with *intermediary services*.

## **How long we keep your personal information**

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

We may keep your data for up to 5 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to *us*.

We may keep your data for longer than 5 years if we cannot delete it for legal, regulatory or technical reasons. Under FCA rules we must retain data regarding products or services we have provided to you for the following timescales:

- Life policies and pension contracts = 5 years
- Pension transfers, opt-outs, FSAVCs = Indefinitely
- MiFID-related business (shares, bonds, units in collective investment schemes and derivatives) = 5 years
- Other business = 3 years

## **Transfer of your information out of the EEA**

Your personal data will be held and processed in the UK. We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.

- Work with *our* agents and advisers who *we* use to help run your accounts and services.

If *we* do transfer information to *our* agents or advisers outside of the EEA, *we* will make sure that it is protected in the same way as if it was being used in the EEA. *We*'ll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more [on the European Commission Justice website](#).
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here [on the European Commission Justice website](#),
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more [about data protection on the European Commission Justice website](#).

You have a right to ask *us* for more information about the safeguards *we* have put in place as mentioned above. To learn more, please see 'Your rights' below.

### **Your rights**

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how *we* use personal data
- To object to how *we* use personal data
- To ask *us* to transfer personal data to another organisation
- To object to automated decisions
- To understand how *we* protect information transferred outside Europe
- To find out more about how *we* use personal data

*We* may ask you for proof of identity when making a request to exercise any of these rights. *We* do this to ensure *we* only disclose information or change your details where *we* know *we* are dealing with the right individual.

*We* will not ask for a fee, unless *we* think your request is unfounded, repetitive or excessive. Where a fee is necessary, *we* will inform you before proceeding with your request.

*We* aim to respond to all valid requests within one month. It may however take *us* longer if the request is particularly complicated or you have made several requests. *We* will always let you know if *we* think a response will take longer than one month. To speed up *our* response, *we* may ask you to provide more detail about what you want to receive or are concerned about.

*We* may not always be able to fully address your request, for example if it would impact the duty of confidentiality *we* owe to others, or if *we* are otherwise legally entitled to deal with the request in a different way.

#### ***To access personal data***

You can ask *us* to confirm whether or not *we* have and are using your personal data. You can also ask to get a copy of your personal data from *us* and for information on how *we* process it.

### ***To rectify / erase personal data***

You can ask that *we* rectify any information about you which is incorrect. *We* will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that *we* erase your personal data if you think *we* no longer need to use it for the purpose *we* collected it from you.

You can also ask that *we* erase your personal data if you have either withdrawn your consent to *us* using your information (if *we* originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where *we* have used it unlawfully or where *we* are subject to a legal obligation to erase your personal data.

*We* may not always be able to comply with your request, for example where *we* need to keep using your personal data in order to comply with *our* legal obligation or where *we* need to use your personal data to establish, exercise or defend legal claims.

### ***To restrict our use of personal data***

You can ask that *we* restrict *our* use of your personal data in certain circumstances, for example where you think the information is inaccurate and *we* need to verify it;

where *our* use of your personal data is not lawful but you do not want *us* to erase it;

where the information is no longer required for the purposes for which it was collected but *we* need it to establish, exercise or defend legal claims; or

where you have objected to *our* use of your personal data but *we* still need to verify if *we* have overriding grounds to use it.

*We* can continue to use your personal data following a request for restriction where *we* have your consent to use it; or *we* need to use it to establish, exercise or defend legal claims, or *we* need to use it to protect the rights of another individual or a company.

### ***To object to use of personal data***

You can object to any use of your personal data which *we* have justified on the basis of *our* legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, *we* may continue to use the personal data if *we* can demonstrate that *we* have compelling legitimate interests to use the information.

### ***To request a transfer of personal data***

You can ask *us* to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where *we* use your personal data in order to perform a contract with you, or where *we* asked for your consent to use your personal data. This right does not apply to any personal data which *we* hold or process outside automated means.

### ***To contest decisions based on automatic decision making***

If *we* made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by *us* produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where *we* are authorised by law to make such decisions and have adopted suitable safeguards in *our* decision making processes to protect your rights and freedoms.

### ***To obtain a copy of our safety measures for transfers outside of Europe***

You can ask for a copy of, or reference to, the safeguards *we* have put in place when your personal data is transferred outside of the European Economic Area. *We* are not required to share details of these safeguards where sharing such details would affect *our* commercial position, or create a security risk.

### ***You can contact us for more information***

If you are not satisfied with the level of information provided in this privacy notice, you can ask *us* about what personal data *we* have about you, what *we* use your information for, who *we* disclose your information to, whether *we* transfer it abroad, how *we* protect it, how long *we* keep it for, what rights you have, how you can make a complaint, where *we* got your data from and whether *we* have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please email or write to *our* Data Protection Officer at [gerry@gdafinancialpartners.com](mailto:gerry@gdafinancialpartners.com) or The Hayloft, Overton Drive, London, E11 2LW. Let *us* have enough information to identify you, e.g. name, address, date of birth; let *us* have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and let *us* know the information to which your request relates.

### **Keeping your personal data secure**

*We* have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. *We* limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

### **Our supervisory authority**

If you are not happy with the way *we* are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* ([www.ico.org.uk](http://www.ico.org.uk)).

*We* ask that you please attempt to resolve any issues with *us* before the ICO.

### **How to contact us**

Please contact *our* Data Protection Officer if you have any questions about this privacy notice or the information *we* hold about you.

You can contact *our* Data Protection Officer at [gerry@gdafinancialpartners.com](mailto:gerry@gdafinancialpartners.com) or The Hayloft, Overton Drive, London, E11 2LW.

## Glossary of Terms

<b><i>we, us or our</i></b>	GDA Financial Partners. A Limited Liability Partnership incorporated under the Limited Liability Partnerships Act 2000 registered in (England and Wales) (Scotland) (company number OC366488) and having its registered office at The Retreat, 406 Roding Lane South, Woodford Green, Essex, IG8 8EY, UK.
<b>contact information</b>	These are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address.
<b>data controller</b>	Means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, <i>we</i> are your data controller as <i>we</i> determine how <i>we</i> will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of <i>us</i> providing you with <i>intermediary services</i> .
<b>data protection regulation</b>	Applicable data privacy and protection laws.
<b>employment status</b>	This is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance.
<b>FCA</b>	The Financial Conduct Authority, being the independent watchdog that regulates financial services.
<b>financial information</b>	This is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60.
<b>health information</b>	This is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history.
<b>identity information</b>	This is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number.
<b>intermediary services</b>	These are the services <i>we</i> provide to you in relation to the products, which may include: investments, pensions, protection and mortgages.
<b>lenders</b>	A mortgage lender (for a list of current lenders which <i>we</i> work with, please contact <i>us</i> – see <i>How to contact us</i> above).
<b>lifestyle information</b>	This includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits.
<b>product</b>	This is an investment, pension, mortgage, protection and/or general insurance product in respect of which <i>we</i> provide <i>intermediary services</i> to you.
<b>product provider</b>	A company which provides investment, pension, protection and/or general insurance products (for a list of product providers which <i>we</i> work with, please contact <i>us</i> – see <i>How to contact us</i> above).
<b>sanction check information</b>	This is information relating to your politically exposed persons (PEPs) status and Her Majesty’s Treasury financial sanctions status, which is recorded to prevent fraud and money laundering.
<b>vulnerability</b>	A vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following

	categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence).
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