

MJB (Partnership) Ltd Data Privacy Policy Draft Ver. D

1. About this Policy

1.1 This policy explains when and why we collect personal information about our clients, and potential clients (prospects) how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [<https://www.mjbpartnership.co.uk>] regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are MJB (Partnership) Ltd. We can be contacted at 1 Dukes Court, Chichester, PO19 8FX. Tel: 01243 771777.

2.2 We are part of the Best Practice IFA Group Limited Network who do have access to our files for compliance and regulatory purposes. The Best Practice Network have their own privacy policy which can be accessed via their website: <https://www.bestpractice.co.uk/best-practice/privacy-policy/>.

3. What information we collect and why

Type of information	Purposes	Legal basis of processing
Individual's name, address, telephone numbers, e-mail address(es).	For ease of communicating policy/investment information.	To keep in contact and to carry out the ongoing service contract with the client.
Clients passport/driving licence/utility bill/bank statement/council tax demand	For AML ID verification, (anti money laundering)	To comply with AML regulations.
Financial information, details of investments, cash assets and pensions held.	To demonstrate that we know our clients before advising	Consent in order to achieve the right client outcome.
Family related information on dependents, children etc	For generational planning/expressions of wish	Consent in order to achieve the right client outcome.
Date of birth / age related information	For advice on matters (such as pension benefits) which are age related	Consent in order to achieve the right client outcome.
Country of birth /Residence	For Tax purposes	To comply with AML regulations

Gender	For advice on matters (such as life expectancy) which are gender related	Consent in order to achieve the right client outcome.
Client's Occupation	For AML certificate completion. For life or health insurance underwriting	In complying with AML legislation. Consent to fulfil the client's needs.
Client's bank account details	To supply the information to the provider so that they can verify the account for payments in or out of a product.	Consent to fulfil the client's needs.
Client's medical information and history	To supply the information to the provider so that they can underwrite life or health insurance, and/or enhanced annuities.	Consent to meet underwriting requirements.

If you contact us, we may keep a record of correspondence.

Telephone calls are recorded and may be stored for up to six years. The information will only be accessed if it is required for confirmation or regulatory purposes and will not be passed onto to any third parties.

4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Some records are held in paper files, these are retained in office whilst a case is being worked on and are otherwise stored in cupboards and cabinets. The office is securely locked when no member of staff is present.

4.4 If paper files are taken offsite by the adviser, such as for a client appointment, then the adviser will take due care to keep them secure and return them to the office as soon as reasonably practical.

4.5 In the event that client sensitive data is to be sent to a client or company electronically, all data will be put in a password protected document. Where possible, if a client is registered for Wealth Platform, documents will be uploaded to the document library and a notification emailed to them.

4.6 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.7 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

4.8 if your personal details change, you may update them by using Wealth platform or by contacting us.

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.

5.2 We may pass your personal data to third parties who are service providers or financial product providers for the purposes of completing illustrations, proposals and providing services to you, or completing tasks. However, we disclose only the personal data that is necessary for the third party to deliver the service or product and we use providers that keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a client of MJB and for as long afterwards as it is in MJB's legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

6.3 In the event the personal data is obtained for a prospective client, all data obtained will be destroyed after a period of 12 months.

7. Destruction of Data

7.1 When data for a prospect client is entered onto Enable a reminder activity is set for 12 months ahead.

7.2 If there is no likelihood of business being written, or no financial transaction, has taken place then the record is removed from Enable together with any documents. Any paper documents will be shredded.

8. Your rights

8.1 You have rights under the GDPR:

(a) to access your personal data

(b) to be provided with information about how your personal data is processed

(c) to have your personal data corrected

(d) to have your personal data erased in certain circumstances

However, we can refuse to comply with a request for erasure where the personal data is being processed to comply with a legal obligation. Under FCA regulation we have a mandatory requirement to retain your data for specified periods (and for some products, such as occupational pension transfers, we are required to retain this data indefinitely) which may impact your Right to Erasure.

(e) to object to or restrict how your personal data is processed

(f) to have your personal data transferred to yourself or to another business in certain circumstances.

8.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

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<https://ico.org.uk/concerns/>
0303 123 1113.
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager, Bryan Hodges, bryan@mjbpartnership.co.uk, 01243 771777