

DATA PRIVACY NOTICE – PJG FINANCIAL SERVICES LTD

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information 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.

Your data will be used for the sole purpose of providing financial advice, administration and management.

“Processing” includes obtaining, recording or holding information or data, transferring it to other companies associated with us, product providers, the FCA or any other statutory, governmental or regulatory body for legitimate purposes including, where relevant, to solicitors and/or other debt collection agencies for debt collection purposes and carrying out operations on the information or data.

You may be assured that we and any company associated with us will treat all personal data and sensitive personal data as confidential and will not process it other than for a legitimate purpose. Steps will be taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary.

If we provide you with financial advice, your data will be kept in accordance with FCA regulatory expectations, which in some cases mean the duration could be indefinite.

PJG Financial Services Ltd collect, 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.

The personal data we collect and use

During the provision of our service to you we may collect the following personal data when you provide it to us:

contact information	identity information	financial information	employment status	lifestyle information	health information
data about criminal convictions or offences			details of any vulnerability		product details

In addition, we may take 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).

Data Processing: We will ensure that we are accountable and are able to demonstrate that data processing only occurs within the following principles:

1. Your data will be lawfully and fairly processed in a transparent manner
2. Your data is collected on the grounds of explicit and legitimate purposes only
3. We will only ask for your data when necessary, explain if data will be shared and how long it will be kept
4. Your data will be accurate, kept up to date and erased without delay should your data no longer be required for the purpose to be processed
5. Your data will only be retained for as long as necessary
6. Your data will be secure

Information collected from other sources: We also obtain personal data from other sources during the provision of offering our intermediary services. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From lenders and/or product providers (product details)
- From identification and verification checking agencies (identity information, sanction check information]

Lawful basis for processing personal data: To enable us to process personal data we must have a ‘lawful basis’ as well as a purpose for processing. Processing data is necessary to achieve our purpose and as such we have a lawful basis. To enable us to process your personal data we must seek your consent. We may be required to share your data with our regulator and other third parties including our auditors or insurers.

How we use your personal data

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> • to ascertain details of your current financial situation for us to give you best advice 	Consent	None
<ul style="list-style-type: none"> • to provide you with intermediary services 	Performance of a contract	Bankhall Compliance Services
<ul style="list-style-type: none"> • to apply for decisions on principle for mortgage quotations and/or quotations for protection and general insurance products on your behalf 	Performance of a contract	Lenders/product providers
<ul style="list-style-type: none"> • to retain records of any advice provided by us to defend potential legal claims or complaints 	Legitimate Interests	External suppliers of data storage and data hosting services to retain records on our behalf
<ul style="list-style-type: none"> • to provide you with details of products and services from us and third parties that may be of interest to you in accordance with your preferences. 	Consent	Lenders/product providers

To provide services to you we may be required to pass your personal information to parties located outside of the European Economic Area (EEA) in countries that do not have Data Protection Laws equivalent to those in the UK. Where this is the case we will take reasonable steps to ensure the privacy of your information.

Sensitive Data: The information provided may also contain sensitive personal data for the purposes of the Act, including information that relates to your physical or mental health or condition; the committing or alleged committing of any offence by you; any proceedings for an offence committed or alleged to have been committed by you, including the outcome or sentence in such proceedings.

Your rights:

The points below clearly set out the rights each client is entitled to. Please ask us for an explanation of each should you wish to have more information.

1. The right to be informed
2. The rights of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. Rights to object
8. Rights not to be subject to automated decision making including profiling

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.

Right to complain

In the event you believe your data has been wrongly processed, stored or handled you have the right to raise a concern with the Information Commissioners Office (ICO). Details on how to do this can be found below.

<https://ico.org.uk/for-the-public/raising-concern>

COMMUNICATION AND MARKETING PREFERENCES

Occasionally, we may send you marketing/promotional communications via email, telephone or post. Recipients will be carefully selected, and information will only be sent where we feel it to be appropriate.

Please indicate **YES** or **NO** in the box below:

I wish to opt IN to receiving communications or marketing material	
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If you consent to us contacting you for this purpose, please tick below to say how you would like us to contact you:

Post		Email		Phone/SMS		Telephone	
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You may inform us at any time if you want to change your options.

CLIENT CONSENT

It is important that you give consent to how we deal with your data, such consent must be given freely, specific, informed and unambiguous. You must make a positive opt in and as such we ask you to sign to give such consent.

I hereby give consent to PJG Financial Services Ltd for my personal data to be processed in accordance with the General Data Protection Regulations (GDPR).

Client Name		Client Name	
Signed		Signed	
Date		Date	

How to contact us

If at any time you wish to withdraw consent for us to cease processing your personal data or sensitive personal data or wish to alter your marketing preferences, please contact The Data Protection Officer (Mr P Gilligan) on 0113 239 9500 or in writing at PJG Financial Services Ltd, 28 St Michael’s Road, Headingley, Leeds. LS6 3AW.

Note: A copy of this document will be placed on file to support our records. In the event of any query in relation to this notice then do not hesitate to call us. It is important to us that you fully understand the contents of the document.