

Privacy Policy

Your Personal Data

Who we are and what does this cover?

Trentham Invest Ltd will be known as the "Controller" of the personal data you provide to us.

In the conduct of business with you we will need to collect information about you which we will hold as data controllers under the **General Data Protection Regulation (GDPR)**. We will use this information to ensure that our advice is suitable for your circumstances. Unless otherwise agreed, we will usually only collect basic personal data about you. If health, life insurance or enhanced annuity contracts are being applied for, we may request medical information including family medical history. This is known as "sensitive personal data". If we need to request sensitive data, we will ask you to give consent specifically for us to hold this data in order to provide our tailored advice service.

The type of personal information we collect will depend upon the purpose for which it is being collected and can include:

- Contact details
- Identity verification
- Family, lifestyle and financial information
- Preferences, aims and personal interests

However, if you wish to see a list of data which we may hold about you, please contact our Data Protection Officer.

What we do with it?

We will use this information to ensure that our advice is suitable for your circumstances. All the personal data we hold about you will be processed by our staff and selected third parties in the United Kingdom. It may also be disclosed to the Financial Conduct Authority (FCA), who regulate us and Financial Ombudsman Service (FOS) which is an independent arbitrator and wherever there is a legal obligation that we do so, and possibly HMRC if requested to do so. Additionally, it may also be disclosed to our Compliance Consultants, Haven Risk Management Ltd, who help to ensure that, in your interests, we abide by the rules of the Financial Services and Markets Act, (FSMA) 2000 and any other regulations.

How we store your information and keep it secure?

We are committed to ensuring the confidentiality of the personal data that we hold and we continue to review our security controls and procedures to ensure that your personal information remains secure.

When we contract with third parties, we ensure that appropriate due diligence has been completed and there are security, privacy and confidentiality agreements in place to ensure your personal information is kept secure.

Please be aware that your information may be stored on a cloud-based system whose services are located within the European Union.

How long will we keep it?

The FCA requires us to keep records of our business transactions for specified periods and as long as it is in your interests that we do so. We will generally keep your personal data for no less than for the duration of our business relationship.

Your data will be updated and amended if necessary at the regular review meetings that you have with your financial adviser and/or if you specifically notify us of any changes to your personal details.

Using your personal data for marketing purposes

We may contact you from time to time by post, fax, e-mail, telephone and SMS to bring to your attention additional products or services which we think may be of benefit to you.

As part of the process of advising clients, Trentham Invest Ltd will ascertain and agree your marketing preferences in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw this consent at any time.

What are your Rights?

Under the General Data Protection Regulation, you have various rights regarding the use of your personal data which are as follows:

- The right to be informed - of any and all matters pertaining to your data.
- The right of access - to any or all of your data at all times.
- The right of rectification - of any mistakes or inaccuracies.
- The right to erasure - of data we hold on you. Please note that this right is not absolute. If you wish for details of when the right to erasure does not apply, please contact our Data Protection Officer.
- The right restrict the processing of your personal data - if for example you have contested its' accuracy and while this is being verified by us.
- The right to data portability - to have your data transferred to another firm.
- The right to object - to any aspect of how we use or handle your data.
- The right not to be subject to automated decision making

Our Lawful Basis for Processing your Personal Data

We intend to rely on your having given your consent (through signing this document) to our processing your data, for one or more specific purposes.

Should this be deemed not to be appropriate, then our basis will be that processing your data is necessary for the performance of a contract (e.g. arranging a policy or an investment) to which you are party.

How to complain about the use of your data?

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights mentioned above, you can contact our Data Protection Officer on compliance@trenthaminvest.co.uk and they will investigate your concerns.

If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Information Commissioner's Office (ICO). You can find further information about the ICO and their complaints procedure at the following link <https://ico.org.uk/concerns>.

This privacy notice does not require a signature although positive affirmation of the right to collect and retain sensitive personal data (where applicable) will be required upon becoming a client of Trentham Invest Ltd.