

GDPR Privacy Notice

How we use your personal data

This privacy notice is to let you know how EA Financial Solutions Ltd (EAFS) look after your personal data. This notice includes what you tell us about yourself, what data we hold, how we use your data, who we may share data with, news updates and marketing we may send to you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our privacy promise

- To keep your data safe and private
- Not sell your data
- Let you decide how to receive news and marketing information

Data Protection Law (GDPR)

This notice was last updated on **21 May 2018** to comply with General Data Protection Regulation (GDPR) which comes into effect on 25 May 2018. To ensure your data is kept safe, EAFS will conduct a data protection audit annually or earlier if the following occur:

- When introducing new technology within the business
- The processing is likely to result in a high risk to the rights and freedoms of individuals

We will make you aware of any major changes to our privacy notice before they become effective.

Who we are

Our offices are located at the following address: 869 High Road, London, N12 8QA

You can find out more about us at <http://eafsolutions.co.uk/>

If you have any questions, or want more details about how we use your personal information, please contact Minesh Patel or Bhavna Patel via post, email info@eafsolutions.co.uk or telephone +44 (0)20 8446 3231

How the law protects you

As well as our Privacy Notice, your privacy is protected by law. This section explains how that works. Data Protection law says that we can use personal information only if we have a proper reason to do so. This includes sharing it outside EAFS.

The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it

A legitimate interest is when we have a business reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

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

What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> • Wealth Management • Financial Planning • Financial Protection • Pensions • Corporate pensions & auto enrolment • Savings & investments • Investment Portfolio management • Taxation • Mortgages 	<ul style="list-style-type: none"> • Your consent • Fulfilling engagement letters & standard terms of businesses • Money laundering regulations • Our legitimate interests • Our legal duty • Professional indemnity insurance • Financial promotions • Dealing with government institutes 	<ul style="list-style-type: none"> • Keeping records up to date • Seeking consent when we need to contact you • Complying with regulations that apply to us • Improving how we deal with financial crime, as well as doing our legal duties in this respect • Being efficient about how we fulfil our legal and contractual duties
<ul style="list-style-type: none"> • To manage our relationship with you or your business • To develop new ways to meet our clients’ needs and to grow our business • To provide advice or guidance about our services • To manage how we work with other companies that provide services to us and our clients • To deliver our services • To collect and recover debts that are owed to us • To respond to complaints and seek to resolve them • To exercise our rights set out in agreements or contracts 		

Groups of personal information

We may use different kinds of personal information and group them together like this

Type of personal information	Description
Financial	Advising on financial planning, wealth management, savings, investments, etc.
Contact	Where you live and how to contact you
Socio-Demographic	This includes details about your work or profession, nationality etc.
Transactional	Details of your income, expenses, benefits, investments etc. when providing financial advice, etc.
Contractual	Details about the services we provide to you.
Locational	Data we get about where you are, for financial planning etc.
Communications	What we learn about you from letters, emails and conversations between us.
Social Relationships	Your family, friends and other relationships
Open Data and Public Records	Details about you that are in public records, such as companies house
Usage data	Other data about how you use our services
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' license or birth certificate i.e. money laundering checks
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 for our services we offer: <ul style="list-style-type: none"> • Health data including gender • Criminal convictions and offences
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you, how you wish us to send compliance etc.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number, UTR

Where we collect personal information from

We may collect personal data information from you, your business, other companies you may have dealt with etc. to fulfil our services we conduct on your behalf.

Data you give us:

- When you enlist for one of our services
- When you use our website. Please see our website and Cookies policy: <http://eafsolutions.co.uk/cookie-policy#.Wv1Vmy-ZO8o>
- Communication via telephone, emails and letters
- At events

Data we collect when you use our services:

- Profile and usage data: this includes when setting you up as a client to identify you when enlist in one of our services
- Income, expenses, benefits, investments
- Payment information

Data from third parties:

- Banks
- Providers
- Financial advisors
- Accountants
- Doctors
- Estate agents
- Social networks and internet searches
- Lawyers and solicitors
- Public information such as companies house
- Companies that introduce you to us
- Agents working on your behalf
- Government and law enforcement agencies

Who we share your personal information with

- Yourself, (spouse, issue, other family member or relative etc. with your consent)
- Businesses i.e. the individuals own company, assistants, PA's
- Our website
- Successor indecent financial advisors
- Banks
- Remote sub-contractors within the UK
- Financial advisors/institutes
- HMRC and other government regulators and authorities
- Fraud prevention agencies
- Lawyers and solicitors
- Companies that introduce you to us i.e. solicitors, accountants, professional bodies etc.
- Companies we have a joint venture or agreement to co-operate with
- Companies that we introduce you to i.e. providers
- Companies you ask us to share your data with

How we use your information to make automated decisions

We sometimes make decisions based on the information we have. This helps improve the efficiency of our services we conduct on your behalf based on what we know. Any major decisions we will contact you for your consent before proceeding.

Here are some examples of automated decisions we make:

- Contacting providers for valuations
- Contacting accountants and solicitors
- Obtaining pensions and financial investments
- Obtaining accounts for companies and tax returns individuals
- Money laundering checks

Fraud Prevention Agencies (FPAs)

We need to confirm your identity before we provide our services to you or your business. Once you have become a client of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We may use Fraud Prevention Agencies to help us with this.

Both we and fraud prevention agencies can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'.

A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

FPAs can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money-laundering.

Sending data outside of the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Following instructions given by you
- Comply with a legal duty

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform our services to you. Any data collection that is optional would be made clear at the point of collection.

Marketing

We may use your personal information to tell you about relevant products and services.

We can only use your personal data to send you marketing information if we have either your consent or a 'legitimate interest'.

You can ask us to stop sending you marketing messages by contacting us at any time. You can change your mind anytime and update how you wish to be contacted by us.

How long we keep your personal information

Records are held for 6 years as per FCA guidelines. Pension transfers are held for life. We will not hold your data longer than necessary unless we have been given specific instruction by the individual or we feel it is required for professional indemnity.

If you are no longer a client, please specifically advise us if you wish to be removed from our media contact or newsletters.

How to get a copy of your personal information

You can request your personal information we hold at any time by contacting us by telephone, email or post.

We may charge a fee of up to £10 to cover the administration costs and will respond within 40 calendar days.

Letting us know if your personal information is incorrect

If you think the information we hold about you is incorrect or needs updating, please do not hesitate to contact us. We will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

Please contact us if you object how we use your data or ask us to delete it or restrict how we use it.

How to complain

Please let us know if you are unhappy with how we have used your personal information. Please contact us using the contact details given in the document.

You also have the right to complain to the Information Commissioner's Office (ICO). Find out on their website how to report a concern.