

DATA PRIVACY NOTICE

Charles Royle and Company 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

Charles Royle and Company 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.

Charles Royle and Company trade as a Partnership and is authorised and regulated by the Financial Conduct Authority. *Our* Financial Services Register number is 145844.

We provide you with financial planning advice and guidance.

The personal data we collect and use

In the course of providing *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*
- correspondence
- marketing preferences
- 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.)

Information collected from other sources

We also obtain personal data from other sources while providing *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*:

- *details of existing loan/mortgage arrangements*
- *details of existing products/investments*
- *trust arrangements*

From *identity and verification agencies*:

- *identity information*
- *sanction check information*

From *other professionals*:

- *accountants*
- *will, power of attorney, trust, divorce settlement*

How we collect and use your personal data

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Our lawful bases for collecting or using personal information are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** - we are collecting or using your information because it benefits you, *our* organisation or someone else, without causing an undue risk of harm to anyone.

All of your data protection rights may apply, except the right to portability. *Our* legitimate interests are:

- Providing Financial Advice and Services:
We use your personal data to understand your financial situation, goals, and risk tolerance, enabling *us* to provide tailored financial advice and services that meet your specific needs, such as investment recommendations, insurance planning, and retirement planning.
- Business Operations:
We use your personal data to manage *our* business operations, including accounting, record-keeping, and client relationship management, ensuring the efficient and smooth operation of *our* firm.
- Compliance with Regulations:
We are required to comply with various regulatory requirements, such as anti-money laundering (AML) regulations and know your customer (KYC) procedures. We process your personal information to ensure compliance with these regulations and to prevent and detect financial crime.
- Marketing and Communication:
We may use your personal information to communicate with you about *our* services, new *products*, and events. We will always ensure that any marketing communications are relevant, tailored to your interests, and comply with all applicable data protection laws.

We believe these legitimate interests are balanced against your rights and freedoms, and we are committed to processing your personal information fairly, transparently, and in accordance with data protection laws.

You have the right to object to the processing of your personal information based on legitimate interests, and we will consider your objections and provide you with information about *our* legitimate interests and the reasons for processing your data.

For more information on *our* use of legitimate interests as a lawful basis you can contact *us* using the contact details set out in this notice.

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
To provide <i>intermediary services</i> .	Performance of a contract.	Bankhall support services.
To provide you with <i>intermediary services</i> .	Performance of a contract.	
To apply for decisions in principle for mortgage <i>products</i> .	Performance of a contract.	<i>Lenders/product providers</i> .

To obtain quotations and terms for protection/impaired life contracts. To apply for <i>products</i> on your behalf.		
To refer you to third party advisers to provide you with advice in relation to service we do not offer: Legal advice eg Will's Estate Planning. Accountancy advice eg tax returns, self-employment.	Consent.	Professional colleagues: Solicitor Accountant.
To retain records of any service or advice provided to you by <i>us</i> in order to defend potential legal claims or complaints.	Legitimate interests.	External data (file) storage and electronic data storage via cloud on <i>our</i> behalf.
To provide you with details of <i>products</i> and services from <i>us</i> and third parties that may be of interest to you in accordance with your preferences. For more information see 'Marketing' below.	Consent.	
To detect, prevent and investigate fraudulent applications for <i>products</i>. To undertake investigation into allegations of misconduct and/or criminal offences. To notify the relevant authorities of any suspicious activity following an investigation undertaken by <i>us</i> into allegations of misconduct and/or criminal offences.	Legitimate interests.	The Financial Conduct Authority. <i>Lenders/product providers.</i> National Crime Agency (NCA). Police. HMRC.

Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- *health information and lifestyle information* when providing *intermediary services* in relation to a protection or impaired life *product*

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of *our* activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

Marketing

We may use personal data we hold about you to help *us* identify, tailor and provide you with details of *products* and services from *us* that may be of interest to you. We will only do so where we have obtained your consent to do this and will do so in accordance with any marketing preferences you have provided to *us*.

In addition, where you provided your consent, we may provide you with details of *products* and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact *us*:

By phone: 01626 332083

By email: info@charlesroyle.co.uk

By Post: Charles Royle and Company, 18 Devon Square, Newton Abbot, TQ12 2HR

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 your personal data will be kept

We do not retain personal data for longer than is necessary to fulfil the purposes for which it was collected, or to comply with our legal and regulatory obligations.

Transfer of your information out of the EEA

We do not routinely transfer your personal data outside the United Kingdom. Where any supplier or service provider processes data outside the UK, we ensure appropriate safeguards are in place in accordance with UK data protection law, such as the UK International Data Transfer Agreement or an adequacy decision where applicable.

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 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.

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. However, we do not use automated decision-making in our assessments, and all financial recommendations we provide are carried out directly by a qualified adviser.

If you would like to exercise any of the above rights, please:

- write to, or email *our* Data Protection Officer at Charles Royle and Company, 18 Devon Square, Newton Abbot, TQ12 2HR. Or via email - info@charlesroyle.co.uk
- 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 photo driving licence or passport and a recent utility or credit card bill)
- 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.

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.

If you wish to contact *our* Data Protection Officer please send an email to info@charlesroyle.co.uk or write to *us* at Charles Royle and Company, 18 Devon Square, Newton Abbot, Devon, TQ12 2HR.

How to complain

If you have any concerns about *our* use of your personal data, you can make a complaint to *us* using the contact details in this privacy notice.

If you remain unhappy with how we have used your data after raising a complaint with *us*, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Glossary of Terms

We, us or our:

Charles Royle and Company - A partnership John Mills and Paul Williams partners in a firm whose principal office is at 18 Devon Square, Newton Abbot, Devon, TQ12 2HR.

Contact information:

These are details that can be used to contact a person, including title, first names 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.

Data controller:

Means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller and we determine how we will collect personal data from you, the scope of data which will be collected, and the purpose for which it will be used in the course of *us* providing you with *intermediary services*.

Data protection regulation:

Applicable data privacy and protection laws.

Employment status:

This is information about your work, if you are employed, self-employed, unemployed, a student or on jobseeker allowance.

FCA:

The Financial Conduct Authority, being the independent watchdog that regulates financial services.

Financial information:

This is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60.

Health information:

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.

Identity information:

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.

Indemnity services:

These are the services we provide to you in relation to the products, which may include:

- review of existing plans and arrangements
- recommendation of new products
- ongoing management of products

Lenders:

A mortgage lender (for a list of current lenders which we work with, please contact *us*, - see How to contact us above).

Lifestyle information:

This includes both work and leisure behaviours patterns. Most relevant to your *products* and may be your smoker status, alcohol consumption, health, retirement age and exercise habits.

Product:

This is an investment, pension, mortgage, protection product in respect of which we provide *intermediary services* to you.

Product provider:

A company which provides investment, pension, protection and/or general insurance products (for a list of product providers which we work with, please contact *us*, - see *How to contact us* above).

Sanction check information:

This is information relating to your politically exposed persons (PEPs) status and His Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering.

Vulnerability:

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 into the following categories:

- health
- resilience - financial
- life events
- capability - financial knowledge and confidence