

PRIVACY NOTICE

John Piper is registered with the Information Commissioner's Office (ICO No. Z9772781) and understands his obligations in regards to your fundamental right to a private life and has controls to ensure your rights and freedoms are protected. He respects and values the privacy of all his clients and will only collect and use personal information fairly and responsibly in ways that are described here, and in a way that is consistent with his obligations and your rights under the law. He will support customer understanding by ensuring any communication meets the information needs of customers and any person with a vulnerability is not disadvantaged with the use of format, layout, fonts and language used.

John Piper undertakes to meet his obligations under the Data Protection Act, the Privacy and Electronic Communications Regulations and the UK General Data Protection Regulation (UK GDPR).

WHAT PERSONAL DATA IS COLLECTED?

John Piper will collect the following data, dependent upon the financial service required:

Name, address, contact telephone numbers, email address, bank statements, passport, council tax and utility bills, driving licence, benefit statements, shotgun licence, payslips, criminal record information, existing pension information, life cover information, investment information, details of assets and liabilities, health information – life policies and long-term care information - annual expenditure and any other existing relevant policy.

Different variations of data are required for each product so he may not be required to collect all of the data listed above for all products.

HOW YOUR PERSONAL DATA IS COLLECTED

You directly provide John Piper with the personal data he collects by the following methods: original physical copies, scanned certified email copies, scanned certified postal copies, of relevant documents. In addition he may collect any personal data you supply to him in other ways, i.e. by completing forms, in emails or in person verbally which is noted.

WHO WILL PROCESS YOUR PERSONAL DATA?

Access to your personal data is permitted only for those employees who require it to fulfil their responsibilities on your behalf. Your personal data will be initially processed by John Piper. Your personal data will be further processed by On-Line Partnership Group Limited on behalf of its subsidiary company In Partnership who acts as our Principal for regulatory purposes. In the event of incapacity of your adviser, your data will be shared with an authorised On-Line Partnership Group Limited locum adviser in order to carry out the responsibilities within your service agreement. All parties will process your personal data in accordance with this Privacy Notice. All parties are subject to information security training to enforce and communicate best practice when handling information.

WHAT HAPPENS IF YOUR PERSONAL DATA IS PROCESSED FOR OTHER REASONS?

Though there are some legal exceptions, if he wishes to process your personal data for any other unrelated purpose than those he has informed you about he will notify you.

WHAT ARE THE CONSEQUENCES IF YOU DO NOT PROVIDE YOUR PERSONAL DATA?

Your personal data is essential to enable him to take steps at your request prior to entering into a contract or to perform a contract to which you are a party. Without this information he will not be able to proceed to provide any financial service. Processing will only occur whereby it is necessary to protect the vital interests of the client.

WHAT MAKES THE PROCESSING LAWFUL?

The lawful basis for the processing of your personal data as per Article 6(1) of the GDPR is:

- Consent. You can remove consent at any time by contacting our Data Protection Representative (details below)
- Necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract
- For compliance with a legal obligation to which we are subject
- For the purposes of the legitimate interests pursued by us.

KEEPING YOUR PERSONAL DATA UP TO DATE

He will record your information exactly as you provide it. You may ask him to update it at any time and he will action your request promptly and notify relevant third parties of any changes.

WHAT ABOUT SENSITIVE PERSONAL DATA?

He will only process sensitive personal data, such as data concerning health, with your explicit and informed consent for specific processing activities. In such cases you will be asked to sign a separate consent form to evidence this and that you understand the purpose(s) of the processing of such data. Your consent may be withdrawn at any time. The processing is in order to:

- to carry out obligations in respect of FCA requirements
- To carry out obligations in respect of financial application requirements on your behalf
- to protect your vital interests e.g. we may pass on information about medical conditions to paramedics if you are unable to give consent due to illness.

Sensitive personal data may include data revealing racial or ethnic origin, or data concerning health. In addition data relating to criminal convictions or offences.

HOW WILL YOUR PERSONAL DATA BE USED FURTHER ('OUR LEGITIMATE INTERESTS')?

- To contact you to ensure that our records of your personal information are correct and up to date;
- to respond to questions or complaints you may have about our services;
- to update you with changes in my terms;
- for statistical or research analysis relating to the performance of my business or that of our principal and understanding the changing needs of my clients;
- to review, improve and develop services I offer or handle complaints;
- to pursue debts or unpaid fees;
- to evidence company practices, for example to fulfil my legal requirement to provide independent audit undertakings;
- to evidence the standards and processes carried out conform to the firm's ethical standards and expectations;
- for direct marketing activities;
- to protect the business from risks which might be introduced by an individual.

You have the right to object to processing for these purposes and they shall cease unless he can show he has compelling legitimate grounds to continue.

PROCESSING WHEN PERFORMING A TASK CARRIED OUT IN THE PUBLIC INTEREST

He will use your personal data to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent to ensure this function is not prejudiced. Part of this processing involves verifying your identity using third parties such as GB Group Plc or Creditsafe Business Solutions Ltd.

WHAT PERSONAL DATA IS REQUIRED?

He only collects data that is necessary to carry out the purposes listed above. This includes data you supply and data he receives from reference agencies. Where practical and lawful he will inform you about any of your personal data he receives from third parties that you may be unaware of.

HOW SECURE WILL YOUR PERSONAL DATA BE?

He will ensure that your data is only accessible to authorised people and will remain confidential at all times. Appropriate security measures are in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information. If he has a contract with another organisation to provide him with services or a service on his behalf to process your personal information, he'll make sure they give reassurances regarding appropriate security measures are in place and only process your data in the way he has authorised them to. These third-parties won't be entitled to use your personal data for their own purposes. If necessary, he will check them to make sure they meet the security requirements he has set. Please contact me if you would like further information.

WILL YOUR PERSONAL DATA BE SHARED WITH ANYONE ELSE?

He may share your data with:

- Appropriate staff such as those who carry out financial or compliance functions.
- Organisations that need your data because we are required to provide it by law (e.g. The FCA, ombudsman services, HMRC, etc...
- Organisations that help us process your personal data to establish your personal characteristic. This is necessary if we are to provide you with the best possible advice and service.
- Organisations that carry out credit references or identity checks such as GB Group Plc or CreditSafe Business Solutions Ltd. These organisations may keep a record of the information and may disclose the fact that a search of its records was made to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors.
- Sometimes other authorised firms with specialist advisers, such as pension specialists or paraplanners, who assist us in providing suitable financial advice and services. If this applies you will be provided with their details on request.
- Law enforcement agencies, courts or other public authorities if he has to, or is authorised to by law.
- Product providers he uses to provide financial services or for direct marketing (see below).
- Where he or his Principal go through a business transaction, such as a merger, being acquired by another company or selling a portion of its assets, your data will, in most instances, be part of the assets transferred.

WEBSITE VISITORS & COOKIES

The only personally identifiable information collected through the *johnpiperifa.co.uk* website is via submitted enquiry forms. He will use the information you supply in a form, such as your contact details, to communicate with you, and to send you details about products and services which might be relevant. Full details about how cookies are used can be found on the website at: www.johnpiperifa.co.uk/cookies.html

WHAT ABOUT DIRECT MARKETING?

He may use your personal data now and in the future to carry out direct marketing activities as these are legitimate interests pursued by his business. Sometimes this includes, with your consent, sharing data with product providers for their marketing activities. You can choose which method you'd prefer him to use to contact you (by email or post) and **you have the right to object at any time** to the use of your personal data for this purpose and I will cease marketing activity. Just email him to let him know about your preferences.

TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE UK / EUROPEAN UNION

He does not usually transfer any of your personal data outside of the UK or EU except when we need to perform pre-contractual measures (credit and identity checks) or because the checks we request are necessary for important reasons of public interest. Some companies, like Creditsafe Business Solutions Ltd, may transfer data outside of the EU to countries which do not, in the view of the EU Commission, offer an adequate level of protection. In such cases Creditsafe encrypts any data it sends to other agencies and only transfers information necessary to carry out checks. *(A list of countries used to perform checks include Germany, Netherland, Belgium, France, Sweden, Norway, Finland, Luxembourg, Switzerland, Liechtenstein, Spain, USA, Estonia, Latvia, Lithuania, Poland, Slovakia, Czech Republic, Hungary, Slovenia, Bosnia, Serbia, Montenegro, Croatia, Macedonia, Kosovo, Albania, Bulgaria, Romania, Ukraine, Austria, Denmark, Moldova, Portugal, Italy, Canada, Brazil, Greenland, China, India, Australia, Russia, South Korea, Taiwan, Mexico, South Africa, New Zealand, Hong Kong, UK.)*

Furthermore, he may occasionally use a third party for the processing of personal data in third countries outside the EU. However, he shall put in place appropriate safeguards to ensure your data is as safe as inside the EU before such transfers occur.

TELEPHONE CALL RECORDING

In line with The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 he may record incoming or outgoing telephone conversations for the following purposes:

- Establishing facts and evidence for business transactions
- Ensuring compliance with regulatory or self-regulatory practices
- Ascertaining and demonstrating that standards are being met
- Preventing or detecting crime
- Investigating or detecting the unauthorised use of that or any other telecommunication system
- Safeguarding the effective operation of the telecommunications system.

HOW LONG WILL YOUR PERSONAL DATA BE KEPT FOR?

The Financial Conduct Authority lays down rules relating to how long your personal data should be held for and he will keep your data to meet these requirements. I will not keep your personal data for longer than is necessary. The following three factors will be used to determine how long your personal data is kept by us: Business requirements; Legal requirements; Regulatory requirements.

REQUESTING A COPY OF YOUR PERSONAL DATA HELD

You may at any time ask for a copy of the personal data being held about you – it is your legal right. Making such a request is called a **Subject Access Request**. He will provide you with a copy of any non-exempt personal data within one month unless he asks you for an extension of time. To protect your personal data, he will ask you to verify your identity before he releases any data. He may refuse your request if he is unable to confirm your identity. Information will be provided to you in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.

IMPORTANT RIGHTS

You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of his business' legitimate interests or in the performance of a task carried out in the public interest. He will no longer process your personal data unless he can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims.

You have the right to object at any time to processing your personal data for marketing activities. In such a case he must stop processing for this purpose.

WHAT ARE YOUR OTHER LEGAL RIGHTS?

In addition to the rights above the additional following rights:

- Where you have given consent, you have the right to withdraw previous consent to processing your personal data at any time
- You have the right to request from me access to and rectification or erasure of personal data or restriction of processing concerning your data
- You have the right to receive data you have provided to me in a structured, commonly used and machine readable format and in a concise, transparent, intelligible, and easily accessible form, using clear and plain language
- You have the right to object
- You have the right to lodge a complaint with the regulator (see below).

To exercise any of these rights please contact John Piper.

HOW TO CONTACT JOHN PIPER

Your trust is important to John Piper. That is why you can contact him about any data protection issues or to make a Subject Access Request by:

- Writing to:
**John Piper IFA,
3 Mead Close,
Stoke-St-Michael,
Radstock,
Somerset, BA3 5JB.**
- Email: office@jpifa.co.uk

HOW DO YOU MAKE A COMPLAINT TO THE REGULATOR?

- By writing to:
**Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire, SK9 5AF**
- By telephoning: **0303 123 1113**
- Via the ICO website: <https://ico.org.uk/make-a-complaint>