

# Privacy Policy

At **Destination Financial Planning Ltd**, we're committed to protecting and respecting your privacy. **By using our website, you're agreeing to be bound by this Policy.**

This Privacy Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes.

**Destination Financial Planning Ltd** is an appointed representative of Navigator Financial Planning Ltd which is authorised and regulated by the Financial Conduct Authority (FCA). FCA number 705459.

**Destination Financial Planning Ltd** and Navigator Financial Planning Ltd are part of the True Wealth Group (TWG), a group of companies of which the parent company is True Wealth Planning Solutions Ltd (TWPS). The True Wealth Group provides access to regulatory and non-regulatory specialist services within the Financial Services sector. **Destination Financial Planning Ltd** acts as a controller for the personal information you provide.

Any questions regarding this Privacy Notice and our privacy practices should be sent by e-mail to [datacontroller@truewg.com](mailto:datacontroller@truewg.com) or to The Data Controller, **Destination Financial Planning Ltd**, Stonyroyd House, 8 Cumberland Road, Leeds, West Yorkshire, LS6 2EF. Alternatively, you can telephone 0113 224 2800.

## How do we collect information from you?

We obtain information about you when you seek our advice or other services.

## What type of information is collected from you?

If you are visiting our website the personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when.

If you are seeking advice or other services from us we will undertake a getting to know you process.

In order to provide financial planning services to you in accordance with this agreement, this may include but is not limited to giving you financial advice and making recommendations as to investments and financial products which are suitable for you. We do so by taking into account current financial markets and economic conditions, availability of products and the providers of those products, as well as a detailed analysis of your personal circumstances and financial requirements and objectives.

Where you have investments or policies we will obtain information on these either from you or upon agreement from you directly from the providers concerned. We will assess your Attitude to Risk and Capacity for loss and record this in our documentation. We will retain records of any investments or policies that you arrange through us.

Where we are providing an ongoing service we will update the information as part of our review process and note our records.

Information may be obtained from you face to face, via post, through e-mail or completion of online documentation. As the information is required to enable us to provide our services if you choose not to provide it we may not be able to continue to advise you. We may use software to evidence your identity. We would not require your consent for electronic ID checks but will inform you, on request how such software operates and the purpose for which it is used.

From time to time we may record both the video and audio meetings that we have. The reason for recording such meetings would be to use the information gathered in them as part of our information gathering process with regards to your circumstances and objectives and to help ensure the accuracy of the meeting minutes. The recordings will be stored for no longer than is necessary without a lawful reason for doing so and will then be securely destroyed.

Where we obtain your data otherwise than directly from you, you will have the same or equivalent rights to those set out in this Notice.

## How is your information used?

We will use your information to:

- i. Act as the basis for any advice we provide
- ii. To carry out our obligations arising from any contracts entered into by you and us;
- iii. Provide information to investment providers or life assurance firms for the purposes of arranging products and services for you;
- iv. Provide our ongoing service to you.
- v. Meet our regulatory obligations in the services we provide to you.
- vi. To provide audit trail and records for the purposes of assessing claims.

## What is the lawful basis on which we will hold your data?

When we speak with you about your investment and insurance requirements we do so on the basis that both parties are entering a contract for the supply of services. We have the right to use your personal data in order to perform that contract, and to arrange the products or services that you require.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end, we have the right to use your personal data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from product providers, insurance providers or third party service providers, compliance providers relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

We will use your personal data to comply with regulatory obligations imposed by the Financial Conduct Authority in regard to the relevant 'Know Your Client' obligations. In addition, to comply with the Regulator's requirements for record keeping for the purposes of audits and reviews, records of transactions undertaken, customer histories, or for any other wider compliance with any legal or regulatory obligation to which we might be subject.

To respond to any legitimate legal requests for information about you for example to the Regulatory authority, HMRC, or pursuant to an order of any court or tribunal having relevant jurisdiction, or as required by law for the purposes of but not limited to combatting fraud, money-laundering and criminal activities.

To carry out our legitimate business and professional management responsibilities which include but are not limited to providing you with suitable advice, ensuring your portfolio and financial products continue to be suitable for you, adhere to anti money laundering requirements and investigating and resolving complaints.

## The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with for example your insurance needs, in particular life insurance and insurance that may assist you in the event of an accident or illness, we may ask you information about your ethnic origin, your health and medical history (special data). We will record and use this special data to make enquiries of insurance providers in

relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together “**Criminal Disclosures**”). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Policy.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

## What happens to Your Personal Data when it is disclosed to us?

In the course of handling your Personal Data, we will:

- Record and store your Personal Data in our paper files, mobile devices and on our computer systems (e-mail, hard drives, online portals and cloud facilities). This information can only be accessed by employees and advisers within **Destination Financial Planning Ltd and its parent company (TWPS)** and not by other companies directly within our group structure except when it is necessary to do so to provide our service to you or to perform any administration tasks associated with or incidental to that service.
- Submit your Personal Data to Product Providers and Insurance Product providers, both in paper form and on-line via a secure portal or encrypted messaging. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues providers may raise.
- Use your Personal Data for the purposes of responding to any queries you may have in relation to any investment product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

## How long is information retained?

We are required by legislation and the Financial Conduct Authority rules to retain records for specified periods. These vary dependent upon the nature of the service provided. We will therefore hold Data that is required to be held for the purposes of any such Regulator at least until the end of any specified limitation period imposed by that Regulator. By way of example, where we are actively managing your investments, we will hold Data in line with Financial Conduct Authority requirements for a period of not less than 6 years following the cessation of our agreement in relation to those investments. Importantly, we will not retain information for longer than is necessary e.g. for longer than the period that is laid down, without a lawful reason for doing so.

## Who has access to your information?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes. From time to time your Personal Data will be shared with:

- Other companies with our group structure and only when it is appropriate to provide our services to you. For details on the Privacy Notices of our other companies within our group please contact us on the address above and we will be pleased to assist you.
- Household member(s) you choose to link your data with on online portals e.g. the Personal Finance Portal (where applicable).
- Investment, insurance and other financial service product providers.
- Third parties to assist us in the delivery of our services to you e.g. to assist us with your enquiry or applications, or who are able to support your needs as identified. These third parties may include but are not limited to, our compliance advisers, paraplanning support providers, product specialists, investment firms, third party research/ analysis firms, estate agents, providers of legal, accountancy, IT and other back office support services.

In each case, your Personal Data will only be shared for the purposes set out in this privacy notice, e.g. to progress your or our investment, insurance and other enquires and/or to provide you with our professional services or to comply with any legal, regulatory or other legislative requirement.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Privacy Policy.

### Your rights in relation to your information

The accuracy of your information is important to us. Where we provide just an initial advice service the information will reflect your situation at that time and we will not normally update this (apart from a change of contact information). Where we are providing an ongoing service, we will update the information as appropriate when we undertake a review with you. If between reviews you change your contact information please notify us and we will update our records. According to our policies and relevant legislation, you have a number of specific rights, as summarised below:

**Access** – You may ask for a copy of the information **Destination Financial Planning Ltd** holds about you and we will provide this within one month of receipt free of charge (we may charge a fee for subsequent or duplicate requests).

**Rectification** - You may ask us to correct any information that we hold that is inaccurate or incomplete.

**Erasure** – You may ask us to delete or cease processing data in certain situations. Please note that we will have regulatory obligations to retain information for certain time periods and we will retain such information as we believe is necessary to fulfil these obligations.

**Restrict processing** – You may ask us to cease processing information. This means that we will be able to retain it but no longer act upon it. In the event that you no longer need our services and terminate them we will automatically cease processing information.

**Portability** – You may have the right to have your data transferred to another service provider in an appropriate electronic format. Please note that we will have regulatory obligations to retain copies of the information as outlined previously.

**Objection** – You may have the right to object to us processing information or using it for marketing purposes.

This is a brief summary of your rights and there may be restrictions on some of them. If you wish to explore any of these rights at any time please contact us on the address above and we will be pleased to assist you.

## Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it is retained securely and processed in a confidential manner. Your information may be accessed by your adviser and our support staff for the purposes of providing our services to you. In addition, it may be accessed by senior managers and our compliance consultants (or the FCA) for the purposes of ensuring compliance with our regulatory obligations and reviewing the quality of our advice.

Information may be transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information that passes between us, and you should consider the risk of this. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected e-mail, ensuring e-mail attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

## Use of 'cookies'

Like many other websites, our website uses cookies. We may use cookies to provide the services, features and functionality offered on our website and to improve our user experience. Cookies are small files or other pieces of data which are downloaded or stored on your computer or other device, that can be tied to information about your use of our website (including any third party services and features offered as part of our website).

By using our website you agree to such use of cookies unless you later decide to disable them. Please note that if you delete or disable our cookies you may experience interruptions in or limitations of functionality in certain areas of the website.

## Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party.

## Transferring your information outside of Europe

Your data is protected by the UK Data Protection Act 2018 and by the EU General Data Protection Regulations (GDPR). As part of the services offered to you the information which you provide to us may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA or when third parties who act on our behalf transfer your personal data to countries outside the EEA. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EEA, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Notice.

## Contacting you

We will make appropriate contact with you to provide the agreed services. Where this includes our ongoing service we will contact you at the agreed intervals to undertake our review. We may also contact you in between the agreed intervals if we believe that you need to take action (e.g. if you should consider making ISA or pension contributions before tax year end) or be aware of changes in the economic situation.

We will not contact you for marketing purposes by post, e-mail, phone or text message unless you have expressly given us your prior consent. You may withdraw your consent to marketing at any time and the use of your Personal Data as described in this privacy notice is not affected by whether you choose to consent to the use of Data for marketing purposes. You can withdraw your consent or change your marketing preferences at any time by contacting us by e-mail: **[datacontroller@truewg.com](mailto:datacontroller@truewg.com)** or post.

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

## Right to complain

If you believe that we are not holding your information correctly or are unhappy at any dealings with us regarding your information you may complain to the Information Commissioners Office. You can do this via their website <https://ico.org.uk/concerns> or by calling 0303 123 1113.

## Review of this Policy

We keep this Policy under regular review, and it was last updated in June 2023.