## **Privacy Notice**

### Who We Are

**Scholes Financial Management Ltd** (*'we' or 'us' or 'our'*) gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Scholes Financial Management Ltd registered office is at 3 Shooters Hill Drive, Rossington, Doncaster, DN11 OFY and we are a company registered in England and Wales under company number 6192696. We are registered on the Information Commissioner's Office Register; registration number 29844226, and act as the data processor when processing your data.

#### **Information That We Collect**

**Scholes Financial Management Ltd** processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

#### The personal data that we collect from is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- National Insurance Number
- Passport Number
- Driver's License Number
- Information Health/Medical
- Criminal Record Check

# *We collect information in the below ways:* - Email Correspondence

#### How We Use Your Personal Data

Scholes Financial Management Ltd takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

#### The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We have a legal obligation to share your personal data with Equifax who are a credit reference agency and provide us with financial background checks prior to providing mortgage related services.
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

## Your Rights

You have the right to access any personal information that Scholes Financial Management Ltd processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Scholes Financial Management Ltd** uses **third-parties** to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. We use Brodericks GBC Chartered Certified Accountants <u>www.brodericksgbc.co.uk</u> to do our bookkeeping and tax returns and they act in the capacity of a processor on our behalf. The only information we provide them with is your name, address and order details to meet business and legal requirements.

## **Safeguarding Measures**

**Scholes Financial Management Ltd** takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, *including:* -

## Encryptions, employee training, restricted access, IT authentication, firewalls, anti-virus/malware.

## Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. **Scholes Financial Management Ltd** does not transfer or store any personal data outside the EU.

#### Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **Scholes Financial Management Ltd**, however, as this information is required for **us to provide you with our services**, we will not be able to offer some/all our services without it.

#### Legitimate Interests

Generally, information we may collect from you and process falls into two categories:

1. Legitimate interests – the processing is necessary for our or a third party's legitimate interests unless overridden by good reason to protect the individual's personal data

2. Contract – the processing is necessary for a contract (insurance policy or employment) between us, or because we are taking specific steps towards entering into a contract

Within the boundaries of those two categories, we collect information from you when you visit our website, when you enter information on it, and when you call, email or write to us. In particular:

We may process information about your use of our website ("Website Data"). Website Data may include your IP address, browser type and version, location data, source of referral, length of visit, pages you view, search queries you make and general use of our website. We may process Website Data to analyse access to and use of our website. We do this for the purpose of monitoring and improving our website and services. We may also use Website Data to engage with our website visitors, to market our services to them and to provide them with information by email or otherwise which may result in them subscribing to our services. Where you provide an email address or phone number to us, including where you enter it in to our website, in doing so you are providing your express consent to receiving communications from us about our services.

We may process information you provide to us and other publically available information about you and your business ("Account Data"). This may include personal data such as your name and contact details. Account Data may be processed for the purpose of assessing your insurance requirements, calculating your insurance premiums and policy conditions, obtaining and providing you with quotes for insurance, arranging and managing your insurance policies, including claims, mid-term alterations, renewals and cancellations. We may also use Account Data to help us improve, market and cross-sell our services, and to monitor our compliance with regulatory requirements.

Account Data may be collected electronically, in writing, over the phone or in person. Please note that we may sometimes record phone calls for the purpose of collecting Account Data, and for training and monitoring our team.

We don't store payment card information on our systems so please don't send it to us.

We're entitled to process personal data where necessary to comply with any legal obligations which we're subject to; to establish or defend any legal claims so as to protect our or your legal rights, or the legal rights of other interested parties; or to obtain or maintain our own insurance cover, obtain professional advice or otherwise manage business risks.

#### How Long We Keep Your Data

**Scholes Financial Management Ltd** only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data *(name, address, contact details)* for a minimum of 7 years after which time it will be destroyed.

## **Use of Cookies**

We use cookies for the following specific purposes:

*Essential website cookies*: These cookies are necessary to provide you with services available through our website and to use some of its features, such as access to secure areas.

*Performance and functionality cookies:* These cookies are used to enhance the performance and functionality of our website but are non-essential to its use. However, without these cookies, certain functionality may become unavailable.

Analytics and customisation cookies: These cookies collect information that is used either in aggregate form to help us understand how our website is being used or how effective our marketing campaigns are, or to help us customise our website for you.

Advertising cookies: These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting ads that are based on your interests.

*Social networking cookies:* These cookies are used to enable you to share pages and content that you find interesting on our website through third party social networking and other websites. These cookies may also be used for advertising purposes too. You can adjust the settings on your computer to reject cookies if you wish. This is usually managed within the "settings" section of your browser.

For more information please read the advice available at aboutcookies.org