



Our Statement on Data Privacy

Deliver Change. For Good.

REFRESHED JANUARY 2020 AT LONDON

Your Privacy

We 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 question, concern or 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

Stanley Group uses and is responsible for the way in which we process, record and manage 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.

We are a company whose office is at 483 Green Lanes, Palmers Green, London N13 4BS, United Kingdom of Great Britain and Northern Ireland.

The personal data we collect and use

In providing our service to you we may collect the following personal data when you provide it to *us*:

- *Your contact information*, including name, address, telephone and email address information
- *Your identity information*, including date of birth, passport and driving licence details, National Insurance number, address verification (e.g. utility bills) and any other identify information we are required to collect within jurisdiction in which you reside or in which we operate or provide services on your behalf
- *Financial information*, including your income and expenditure, property, investments and information about other assets, and any mortgage loans and other secured and unsecured loans and credit cards
- *Your employment status*
- *Information about your lifestyle, for example nicotine and/or alcohol consumption*
- *Health information*
- *Details of any vulnerability*
- *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 about any existing business interests and/or potential conflicts of interest*
- *Criminal and background checks, where we are required to obtain and record this information, for example in matters of employment*

Information collected from other sources

We also obtain personal data from other sources in 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 identification and verification checking agencies:
 - *identity information*
 - *sanction check information*
- Solicitors and accountants:
 - Details of wills and/or Trusts
 - Business accounts

Personal data (shown in table)

- How we use your personal data
- The lawful bases upon which we collect and use your personal data
- With whom we routinely share your personal data

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
To provide you with intermediary services	Performance of a contract Consent for special categories of data	Our clients, product providers and consultants
To submit tenders for services or participation in arrangement of contractual obligations	Performance of a contract Consent for special categories of data	Our clients, product providers and consultants
To retain records of any services or advice provided to you by us in order to defend legal claims or complaints	Legitimate interests	External suppliers of data storage and data hosting services to retain records on our behalf.
To provide you with details of products and services from us and third parties that may be of interest to you in accordance with your preferences.	Consent	

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 insurance product for the purposes of services supply to our clients or Group projects/programmes of work

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

Whether information must 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 for us to provide you with *intermediary services*.

How long your personal data will be kept

We only retain your data for so long as it is necessary to fulfil the purpose for which it was collected. There are regulatory and legislative requirements which oblige us to keep certain data for longer, and to comply with those regulatory requirements we keep that data for seven years. In very limited circumstances, we may be required to keep some specific information for longer, but we regularly review our retention obligations to ensure we don't keep personal information longer than we are legally obliged to.

If you want details of the statutory retention periods for various product types, please contact us and we will obtain the latest legal position on your behalf.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area. However, product providers, lenders and investment managers may administer your data and/or policy, as well as any existing contract(s) for services you may have with them for the provision of other services, from centres in countries outside Europe (such as India and the USA). Such countries do not have the same data protection laws as the United Kingdom or the EEA. However, they are required to put into place a European Commission-approved contract that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

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 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 find out more about how we use personal data

We will 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, or the data request is complex, or you ask for multiple copies of the same information. Where a fee is necessary, we will inform you before proceeding with your request. We withhold the right to decline your request where we are authorised by regulation and/or legislation to do so.

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 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 based on 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 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 and from where we obtained your data.

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

- email or write to our Data Protection Officer at info@stanleygroup.org or 483 Green Lanes, Palmers Green, London, N13 4BS;
- 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 driving licence or passport and a recent utility or credit card bill); and
- 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.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (ICO). It has enforcement powers and can investigate compliance with *data protection regulation* (www.ico.org.uk). We ask that you please attempt to resolve any issues with us before the ICO.

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@stanleygroup.org or 483 Green Lanes, Palmers Green, London, N13 4BS;

Declaration

I/We consent for Stanley Group to hold and process My/Our personal data for the purposes of provision of Professional Services, and I/We authorise the transfer of personal information, on a confidential basis and in accordance with the Data Protection Act 1998 and the General Data Protection Regulations 2018, between Stanley Group and any relevant third parties. I/We agree that Stanley Group, or any such third party may contact me in the future by any means of communication considered appropriate at the time.

If there is a means of communication that **YOU DO NOT** wish us to use, please indicate by ticking the appropriate box(es) below:

Post

☐

Telephone

☐

Email

☐

SMS

☐

Client
Signature:

Client Signature:

Print Name:

Print Name:

Date of
Signature:
e:

Date of Signature:

DATA PRIVACY STATEMENT GLOSSARY OF TERMS

Glossary of Terms

We, us or our:	Stanley Group Consultants Ltd., 483 Green Lanes, Palmers Green, London N13 4BS
Contact information: including title, first	These are details that can be used to contact a person, name, 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: determines the means	Means a natural or legal person (such as a company) which and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with <i>intermediary services</i> .
Data Protection Regulation:	Applicable data privacy and protection laws.
Employment Status: self-employed,	This is information about your work, if you are employed, unemployed, a student or on job seeker allowance.
FCA:	The Financial Conduct Authority, being the independent watchdog that regulates financial services.
Financial Information: salary/income,	This is information relating to your financial status, including outgoings/expenditure, secured and unsecured debt, tax rate and P60.
Health Information: symptoms,	This is information relating to your medical history, including 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: person or verify their	This is any information that can be used to distinguish a identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers' licence and national insurance number.
Intermediary Services:	These are the services we provide to you in relation to the products, which may include insurance products.

Lifestyle:	This includes both work and leisure.
Information:	Behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits.
Product:	This is an investment, pension and/or protection product in respect of which we provide <i>intermediary services</i> to you.
Product Providers and Lenders:	<p>A company which provides insurance, protection and/or general insurance</p> <p>products (for a list of product providers which we work with, please contact us – see <i>How to contact us</i> above).</p>
Sanction Check Information:	<p>This is information relating to your politically exposed persons (PEPs) status and</p> <p>Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering.</p>
Vulnerability:	A vulnerable person is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care. These persons are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall into the following categories: health; resilience (financial); life events; and capability (financial knowledge/confidence).