



DATA PRIVACY NOTICE

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 complaint.

Who we are

Foundation Financial Planning 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. When we mention FFP", "we", "us" or "our" we are referring to Foundation Financial Planning

Foundation Financial Planning is the trading style of Gianni Campopiano. The registered business address of Foundation Financial Planning is Maxwelton House 41-43 Boltro Road Haywards Heath West Sussex RH16 1BJ and is authorised and regulated by the Financial Conduct Authority under the reference number 476019. We provide you with independent financial advice

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
- 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)
- Product details

- Information about your credit status although we do not run specific credit checks

Information collected from other sources

We also obtain personal data from other sources in the course of 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 ie product details
- From identification and verification checking agencies ie identity information
- Sanction check information

How we use your personal data

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 you with intermediary services	Performance of a contract	Bankhall Support services. Bankhall provides us with compliance services. File checking and practice audit. The Financial Conduct Authority (FCA) the FCA is our regulator.
To apply for products on your behalf ie investments, trust wrappers, insurance and mortgages	Performance of a contract	Providers of investments lenders and insurance companies
To refer to you third parties ie solicitors or pension transfer providers	Consent	Before referring you we will consult with you
To retain records of advice and service provided to you in order to defend claims or complaints	Legitimate interest	Data storage on site, and cloud providers

We only collect the personal data necessary for the provision of our services and once the data is no longer needed we delete it. **We will never sell or pass personal data to any third party for marketing purposes.**

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; and/or
- Criminal conviction or offence information when providing intermediary services in relation to a general insurance product

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 and then have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

We will not provide you with details of products and services of third parties unless there is a technical reason to do so ie a solicitor or a pension transfer service.

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

By phone: 01444 410 276

By email: enquiries@foundationfp.com

By Post: Foundation Financial Planning Maxwellton House 41-43 Boltro Road Haywards Heath West Sussex RH16 1BJ

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 your personal data will help us to provide you with accurate and optimal intermediary services.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

Activity	Length of time
Where we consult with you and you do not become a client	12 Months
Regulated advice processes for active clients	Indefinitely
Advice processes for inactive client ie no business has been conducted for seven years and there are no investment funds under advice	A further seven years
Unregulated advice processes' where no further advice has taken place for 7 years	A further seven years

Why do we retain your data for the periods shown above?

- It can be useful to you if there is an enquiry from a regulator or HMRC
- Our regulator determines how long files should be retained
- If a complaint arises and we have to submit information for this activity

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries. Where your personal data is used by data processors in the Isle of Man the Isle of Man have to comply with EU GDPR Law

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. Page | 5

We have a duty to keep your data current so please ensure you let us know if any of your personal details change so we can update our records.

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.

To contest decisions based on automatic decision making

If a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision-making processes to protect your rights and freedoms.

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.

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

- Email or write to our data protection officer Gianni Campopiano. gianni@foundationfp.com
- Or Gianni Campopiano Data Protection Officer at Foundation Financial Planning Maxwellton House 41-43 Boltro Road Haywards Heath West Sussex RH16 1BJ
- 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. 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 Gianni Campopiano. gianni@foundationfp.com. Or write to Gianni Campopiano Data Protection Officer at Foundation Financial Planning Maxwellton House 41-43 Boltro Road Haywards Heath West Sussex RH16 1BJ.

Signed

Signed on behalf of Foundation Financial Planning

..... Date.....

MAXWELTON HOUSE ♦ BOLTRO ROAD ♦ HAYWARDS HEATH ♦ WEST SUSSEX ♦ RH16 1BJ

TEL: 01444 410 276 ♦ FAX 01444 410 374 ♦ Email: enquiries@foundationfp.com

www.foundationfp.com

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