



Equilibrium privacy notice

During the course of our relationship, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (**Your Personal Data**). This important document allows us to explain what we will need to do with Your Personal Data, and the various rights you have in relation to it.

What do we mean by ‘Your Personal Data’?

Your Personal Data is any information that describes or relates to your personal circumstances. It may identify you directly, for example your name, address, date of birth, National Insurance number. It could also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your investments or insurance requirements, Your Personal Data may include:

- Titles, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity;
- Employment and remuneration information, (including salary/bonus schemes/other benefits);
- Bank account details, tax information, loans and credit commitments, sources of income and expenditure, family circumstances and details of dependents;
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information);
- Any pre-existing investment or insurance products and the terms and conditions relating to these.

The basis upon which our firm will deal with Your Personal Data

We speak with you about your investment or insurance requirements on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract and to arrange and manage the products you require, we have the right to use Your Personal Data for the purposes detailed in the next section.

Alternatively, either in the course of our initial discussions with you or when the contract between us has come to an end for whatever reason, 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 providers or our compliance consultants relating to the advice we have given to you, or to ask for feedback on the service you received.

On occasion, we will use Your Personal data for contractual responsibilities that we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

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 investments, in particular products with an element of life insurance, such as Whole of Life policies or Discounted Gift Trust Investment Bonds, we may ask you information about your ethnic origin, your health and medical history (Your Special Data). We will record and use Your Special Data in order to make enquiries to insurance / investment providers in relation to 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 you disclosing information to us that relates to historic or current criminal convictions or offences (together known as 'Criminal Disclosures'). This is relevant to our anti-money laundering procedures and is relevant in the prevention of tax evasion 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 Notice.

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.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly from you directly. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances, needs and preferences in relation to investment and insurance. You will provide information to us both verbally and in writing, including email.

We may also obtain some information from third parties, for example information in the public domain such as the voters roll. As part of our process we complete electronic ID checks which we do not require your consent for, but we will inform you of how such software operates and the purpose for which it is used.

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 system's websites, email, hard drives, and cloud facilities. This information can only be accessed by employees and consultants within our firm when it is necessary to provide our service to you or perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to product providers, both in paper form and online via a secure portal. 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 that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment 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.

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Investment providers and insurance providers
- Third parties who we believe will be able to assist us with your enquiry or application or support your needs as identified. These third parties will include but may not be limited to, our compliance advisers, product specialists, providers of legal and taxation services such as a solicitor or accountant (in case where we believe your circumstances require it).

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your investment or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle 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 Notice.

We do not envisage that the performance of our service will involve Your Personal Data being transferred outside of the European Economic Area.

Security and retention of Your Personal Data

Your privacy is important to us. We will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against being accessed unlawfully or maliciously by a third party.

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 email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years. We will retain records indefinitely in instances whereby we have the legal right to such information

Your rights in relation to Your Personal Data

You can:

- request copies of Your Personal Data that is under our control;
- ask us to further explain how we use Your Personal Data;
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request);
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish;
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety).

How to make contact with us in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to exercise any of your rights set out within it please contact:

Debbie Jukes
Ascot House
Epsom Avenue
Handforth
Wilmslow
SK9 3DF

Email: Debbie.jukes@equilibrium.co.uk

Telephone: 0161 486 2250

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

You should contact us as soon as possible if you become aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data, you may lodge a complaint with the UK's data protection regulator, the ICO. You can contact them through their website at <https://ico.org.uk/global/contact-us/> or by writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.