Privacy Notice

What is General Data Protection Regulation

General Data Protection Regulation (GDPR) was adopted by the EU Council and Parliament in April 2016 to standardise data protection across the EU and improve the flow of information. As a regulation, it ensures greater consistency as additional laws or interpretation by each member state are not required. The GDPR also addresses modern day data protection requirements, applies to an increased scope and provides more detailed definitions of what constitutes personal data, among other things. The GDPR took effect on May 2018, replacing existing EU and national data protection legislation.

Who we are

For the purpose of the General Data Protection Regulation, the “data subject” is the client. **Allen Tomas & Co Financial Management Ltd** is both the “data controller” and the “data processer”. **Allen Tomas & Co Financial Management Ltd**, is a company registered in England and Wales (registration number: 8864562)

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| ***Data subject*** *is a living natural person to whom personal data relates****Data Controller*** *means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data****Data Processor*** *means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller* |

Information we may collect from clients

All processing of personal data must be done in accordance with the data protection principles of the Regulation, and the firm’s policies and procedures are designed to ensure compliance with them. Personal data must be processed lawfully, fairly and transparently. GDPR introduces the requirement for transparency whereby the controller has transparent and easily accessible policies relating to the processing of personal data and the exercise of individuals’ “rights and freedoms”. Where the firm provides online services to children, parental, or custodial authorisation must be obtained. This requirement applies to children under the age of 18. We may collect and process the following personal data about clients, which will only be collected for legitimate and specified reasons, which is necessary for processing:

What is Personal Data?

Under the EU’s General Data Protection Regulation, Personal Data is defined as

 ***“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.***

Special Categories of Personal Data

Certain data is classified under the Regulation as “special categories”:

* Racial
* Ethnic origin
* Political Opinions
* Religious Beliefs
* Trade-union membership
* Genetic Data
* Biometric Data and Health Data
* Data concerning a natural person's sex life
* Sexual orientation
* Other

Consent is required for **Allen Tomas & Co Financial Management Ltd** to process both types of personal data, but it must be explicitly given. Where we are asking clients for sensitive personal data we will always tell them why and how the information will be used.

Information clients give us

Clients may give us personal information by filling in forms or by corresponding with us via phone, e-mail or post. This includes information they provide when, for example, we complete a Fact-Find or Annual Review questionnaire. The information they give us may include their name, address, e-mail address, phone number, financial and credit card information and any further personal data required as part of our fact-finding research which they willingly share.

Information we receive from other sources

Upon receipt of a Letter of Authority from clients, we may receive information about them from other providers. In this case we will have informed them when we collected that data that it may be shared internally and, combined with data collected via a fact-find or annual review questionnaire. We are also working closely with third parties including, for example, analytics providers and search information providers, and may receive information about the client from them.

Accuracy and storing of data.

We will only keep clients data in an identifiable form for as long as necessary for its intended purposes.

Uses made of client’s personal information

We (or third-party processors acting on our behalf) may use information held about clients:

* to carry out our obligations arising from any contracts entered between them and us and to provide them with the information and services that they request from us
* where they have given us their consent to provide us with information about **Allen Tomas & Co Financial Management Ltd** services or current news, in which we feel may interest them.  Details of how they may opt out of such communications from us are set out in these communications
* to notify them about changes to our services
* for internal operations, data analysis and research purposes

Disclosure of your information

We may share your information with selected third parties including but not limited to:

* Suppliers, Life Offices and from time to time instruct sub-contractors (in the form of external paraplanners) for the performance of any contract we enter with them or the client
* Analytics and product providers that assist us in the verification of the data subject, research (including quotes/illustrations) and recommendation of products/solutions made to the client

The GDPR permits certain disclosures without consent so long as the information is requested for one or more of the following purposes:

* to safeguard national security
* prevention or detection of crime including the apprehension or prosecution of offenders
* assessment or collection of tax duty
* discharge of regulatory functions (includes health, safety and welfare of persons at work)
* to prevent serious harm to a third party
* to protect the vital interests of the individual, this refers to life and death situations

All requests to provide data for one of these reasons must be supported by appropriate paperwork and all such disclosures must be specifically authorised.

Consent

**Allen Tomas & Co Financial Management Ltd** understands ‘consent’ to mean that it has been explicitly and freely given, specific, informed and unambiguous indication of the “data subject’s” wishes by which they by statement, or by a clear affirmative action, signifies agreement to the processing of personal data relating to themselves. Their consent can be withdrawn at any time.

**Allen Tomas & Co Financial Management Ltd** understands ‘consent’ to mean that the “data subject” has been fully informed of the intended processing and has signified their agreement, while in a fit state of mind to do so and without pressure being exerted. Consent obtained under duress or on the basis of misleading information will not be a valid basis for processing.

Security

**Allen Tomas & Co Financial Management Ltd** is responsible for transmitting the data without hindrance and ensures that it is transmitted with the appropriate level of security. The firm will assess the specific risks linked with data portability and take appropriate risk mitigation measures. The Principals of the firm are responsible for the application and effective working of this procedure, and for reporting performance to the Board/Principals.

Fairstone’s General Terms

Allen Tomas and Co Financial Management is a trading name of Fairstone Wealth Management Ltd. Fairstone Wealth Management Ltd is authorised and regulated by the Financial Conduct Authority - FRN: 188596. Client’s will need to sign Fairstone’s General Terms in order to transact business with our firm. Information on how Fairstone use and protect client’s personal information is in the Privacy Notice which is available at www.fairstone.co.uk/privacy-policy and is provided to them as part of this agreement.

Fairstone are required by the FCA to keep records of electronic communications with our clients in relation to the arranging of transactions in investments that are categorised as financial instruments, mortgages, and insurances.

**Clients** have a right to receive a copy of the personal information that we hold about them. If clients believe that any information, we hold is not correct or incomplete, they should contact the Data Protection Officer at 8 Camberwell Way, Doxford International Business Park, Sunderland, SR3 3XN. We will promptly amend any information that is incorrect or incomplete. Alternatively, clients can raise any concerns with the Information Commissioners Office www.ico.org.uk.