

## Privacy Notice

Effective 12 April 2024

We are Trident Financial Planning Limited. We provide financial planning and financial advisory services to our clients, striving to put our clients first and provide trusted advice and a personalised service. We are part Foundation Investment Management Limited who are part of Focus Financial Partners which are a global alliance of boutique financial advice firms. You can find out more about us at [www.tridentfp.co.uk](http://www.tridentfp.co.uk). This privacy notice explains how we use any personal information we collect about you.

### What information do we collect about you?

We collect information about you in different situations, and for different purposes, depending on the nature of our relationship with you.

Generally, the information we collect about you will relate to your personal and financial circumstances. However, it may also include special categories of personal data such as data about your health if this is necessary for the provision of our services.

We may also collect information about your spouse or partner, family members, dependents, or business partners.

We are responsible for the use of the information we collect about you, and this notice provides you with details about all those uses and your rights.

We have set out below the different situations in which we collect personal data, and the associated purposes and legal reasons for our data collection and processing. Where we use your information for our business interests (sometimes known as “legitimate interests”) we have assessed our interests and balanced them against your rights to ensure that our processing is reasonable and that your rights are protected.

<b>If you are:</b>	<b>Data we collect about you:</b>	<b>How we collect that data</b>	<b>What we use that data for</b>	<b>The legal reason we use that data is:</b>
Enquiring about our services	Your name, contact details, date of birth, and gender ID information such as passport, driving licence and address verification information Employment history Financial information including bank	Your contacts with us Completion of product application forms Publically available sources Credit reference agencies and other information service	Identification checking Responding to your questions and in preparation for entry to a contract with you Prevention and investigation of fraud Compliance with our legal	Our legitimate interest in the functioning of our business operations and commencing relationships with new clients To enter into a contract with you Compliance with our legal obligations

If you are:	Data we collect about you:	How we collect that data	What we use that data for	The legal reason we use that data is:
	<p>details, your wealth, assets, and liabilities</p> <p>Credit and other checks including sanctions lists</p> <p>Publically available data</p> <p>Information collected during recorded conversations with you</p> <p>Details of spouse or partner, family members, dependents, and business partners</p> <p>Marketing preferences and details of your use of our services</p> <p><b>Special category data</b></p> <p>Criminal records, where disclosed through a screening check</p> <p>Health data, where relevant to our services</p> <p>Trade union membership, if part of your employment history</p>	<p>providers</p> <p>From our group companies</p> <p>From other professionals or our referral partners</p>	<p>obligations</p> <p>Marketing, where you consent</p> <p>Improving our services, staff training</p> <p>Information security</p> <p>Record-keeping and other business purposes, management information</p>	<p><b>Special category data</b></p> <p>Your explicit consent (we may not be able to provide you with all our services if we cannot use all your information)</p> <p>The substantial public interest in preventing fraud and other criminal activity, and complying with our regulatory requirements</p> <p>Establishing our legal rights if we are party to legal action</p>
<p>One of our clients</p>	<p>Your name, contact details, date of birth, and gender</p> <p>ID information such as passport, driving licence and address verification information</p> <p>National Insurance details</p> <p>Employment history</p> <p>Financial information including bank</p>	<p>Your contacts with us</p> <p>Completion of product application forms</p> <p>Publically available sources</p> <p>Credit reference agencies and other information service</p>	<p>Identification checking</p> <p>Service provision in accordance with our engagement letters</p> <p>Prevention and investigation of fraud</p> <p>Compliance with our legal obligations</p>	<p>Required in order to enter and perform our contract with you</p> <p>Compliance with our legal obligations</p> <p>Our legitimate interest in the functioning of our business operations and protection of our clients</p>

If you are:	Data we collect about you:	How we collect that data	What we use that data for	The legal reason we use that data is:
	<p>details, your wealth, assets, and liabilities</p> <p>Credit and other checks including sanctions lists</p> <p>Publically available data</p> <p>Information collected during recorded conversations with you</p> <p>Details of spouse or partner, family members, dependents, and business partners</p> <p>Marketing preferences and details of your use of our services</p> <p><b>Special categories</b></p> <p>Criminal records, where disclosed through a screening check</p> <p>Health data, where relevant to our services</p> <p>Trade union membership, if part of your employment history</p>	<p>providers</p> <p>From our group companies</p> <p>From other professionals or our referral partners</p>	<p>Communications and issue resolution with you</p> <p>Record-keeping and other business purposes, management information</p> <p>Marketing, where you consent</p> <p>Improving our services, staff training</p> <p>Information security</p>	<p><b>Special category data</b></p> <p>Your explicit consent (we may not be able to provide you with all our services if we cannot use all your information)</p> <p>The substantial public interest in preventing fraud and other criminal activity, and complying with our regulatory requirements</p> <p>Establishing our legal rights, if we are party to legal actions</p>
<p>A spouse or partner, family member, dependent or business partner of one of our clients</p>	<p>Your name, contact details, date of birth, and gender</p> <p>ID information such as passport, driving licence and address verification information</p> <p>Employment history</p> <p>Financial information including bank details, your wealth, assets and liabilities</p>	<p>From our client and documents provided by our client</p> <p>Credit reference and other information service providers</p>	<p>Identification checking</p> <p>Service provision in accordance with our engagement letters</p> <p>Prevention and investigation of fraud</p> <p>Compliance with our legal obligations</p>	<p>Compliance with our legal obligations</p> <p>Our legitimate interest in service provision to our client, and the functioning of our business operations and protection of our clients</p> <p><b>Special category data</b></p> <p>Your explicit consent (we may</p>

If you are:	Data we collect about you:	How we collect that data	What we use that data for	The legal reason we use that data is:
	<p>Credit and other checks including sanctions lists</p> <p>Publically available data</p> <p><b>Special category data</b> Health data where relevant to our services</p> <p>Trade union membership if part of your employment history</p>		<p>Record-keeping and other business purposes, management information</p> <p>Improving our services, staff training</p>	<p>not be able to provide you with all our services if we cannot use all your information)</p> <p>The substantial public interest in preventing fraud and other criminal activity, and complying with our regulatory requirements</p> <p>Establishing our legal rights if we are party to legal actions</p>
A service provider or business partner of ours	<p>Contact and professional details</p> <p>Financial details such as bank accounts, and information derived from credit and anti-fraud checks</p> <p>Publically available information about you</p>	<p>From you</p> <p>From publically available sources</p> <p>From service providers providing information services to us</p> <p>From our group companies</p>	<p>Carrying out anti-fraud, credit and anti-money laundering checks</p> <p>Assessing your suitability as a service provider</p> <p>Complying with legal obligations</p> <p>Record-keeping and other business purposes, management information</p> <p>Complaint management and monitoring</p>	<p>Compliance with our legal obligations</p> <p>Required in order to enter a contract with you</p> <p>Our legitimate interest in the functioning of our business operations and protection of our clients</p>
A visitor to our website	<p>Information collected using cookies</p> <p>Your contact details and other details you submit to us using website contact functions</p>	From your use of our website	<p>Responding to your enquiries</p> <p>Operating our website securely and robustly</p>	Our legitimate interest in a well-functioning website and being able to respond to your enquiries

## Who might we share your information with?

We only share your information with other organisations if it is required for the purposes set out above and under one of our legal reasons.

Some information sharing is with organisations who process your information on our instructions (such as IT service providers, or investment product platforms that we use), under an agreement setting out those instructions and otherwise meeting the standards required by law.

Some information sharing is with organisations who will determine themselves how they use your information (such as investment or insurance product providers). We comply with best practice, including in relation to secure transfer of information, in relation to these organisations. They or we will let you know how they use your information.

We share your information with:

**Service providers** such as information systems and services, outsourced service providers, information security, document and file management services, professional advisors

**Product providers and administrators** such as platform providers, product providers, portfolio and fund managers and life insurers, and administrators of any of them

**Focus Financial Partners** (our parent company) and other group companies for their internal control, financial reporting, regulatory or auditing purposes

**Foundation Investment Management Limited** - we are an appointed representative of Foundation Investment Management Limited our parent company and they provide us with operational services and support, we share information with them in order to meet our regulatory requirements and to facilitate the service we deliver to you.

**Information service providers** such as credit reference agencies, fraud and sanctions checking service providers

**Our auditors and insurers**

**Our regulators** including the Financial Conduct Authority and the Financial Ombudsman Service

**Law enforcement agencies, HMRC and fraud detection agencies**

## How long do we keep hold of your information?

We're subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests.

## When your personal data is transferred overseas

We transfer your personal data to territories outside the UK. For example, we use service providers who may have infrastructure outside the UK. We will always take the appropriate actions to protect your information when we do this. These include:

- Transferring data to territories in the European Economic Area, which the UK government has authorised because of those territories' high standards of personal data protection
- Using standard contract clauses approved by the Information Commissioner for international data transfers
- Transferring data to territories outside the EEA where the UK has assessed their level of

personal data protection as adequate to protect your rights.

We may transfer your personal data outside the UK, for reasons that include:

- To provide information to Focus, as described above
- In order to support service provision to our clients living abroad
- In order to use service providers who have data processing facilities abroad (such as IT services, or product providers)
- To comply with anti-fraud and money laundering regulations.

## Your rights in relation to our use of your information

We have briefly described below your rights in relation to our processing of your personal data. You can exercise these rights by contacting us (see How to contact us, below). In general, there is no charge.

We take your rights seriously and consider your requests to exercise them. However, your rights are not absolute and we may not be able to comply with your request if, for example, it would cause us to break a legal obligation binding on us.

**Access to your information** You can request a copy of the personal data we hold about you, and information about how we use it. We will usually verify your identity before we provide this information, as a security measure.

**Correcting your information** We will correct your personal data if it is inaccurate. Please tell us if you think there are any mistakes in the personal data we hold about you.

**Restriction of processing** Sometimes you can ask us to stop using your personal data, for example where you think we no longer have a good reason for our use.

**Withdrawal of consent** If we rely on your consent to process your data, you can withdraw it by telling us.

**Erasure** You can ask us to delete your personal data in some circumstances. If you do this, we need to consider whether we have a legal reason to retain your information and whether we can comply with your request.

**Direct marketing** You can choose not to receive our marketing messages at any time. This does not affect our communications to you regarding our services that you already receive. See “Marketing”, below.

**Object to processing** If we use your information for our own business interests, you can object to this.

**Data transfer** Sometimes you can request a copy of your data be transferred to someone else. We may need to consider other factors such as our regulatory requirements if you make such a request.

**Automated processing** We use software and automated systems to process your data and provide you with the best service, but all decisions regarding your information are made by our skilled teams. You have a right not to be the subject of an automated decision, and this is how we observe that right.

**Complaints** You can complain about our use of your personal data to the Information Commissioner. See “What can you do if you are unhappy with how your personal data is processed?” below.

## Protecting your information

We take the security of your information extremely seriously and apply industry standard protection

measures to our systems which store it. We ensure all our staff handling your personal data understand its importance

## Marketing

We'd like to send you information about our products and services. If you've agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by post, or email at [enquiries@tridentfp.co.uk](mailto:enquiries@tridentfp.co.uk).

## Cookies

We use cookies to operate our website.

Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

## Other websites

Our website may contain links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## What can you do if you are unhappy with how your personal data is processed?

If you would like more information about our processing of your data, please contact us at the contact points listed below in "How to contact us".

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office

[ico.org.uk](http://ico.org.uk)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

0303 123 1113 (local rate)

## Changes to our privacy policy

We keep our privacy policy under review, and we'll place any updates on our website\_or inform you of any changes when they occur.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at [andrew@tridentfp.co.uk](mailto:andrew@tridentfp.co.uk)

Or write to us at Trident Financial Planning Limited, 1 Markham Mews, Broad Street, Wokingham, RG40 1AB.