

CGMCTL privacy notice

CGMCTL treats the privacy of all those with whom it has dealings very seriously. This notice explains how we protect and manage any personal data you share with us and that we hold about you including how we collect, process, share and protect that data.

What information do we collect about you?

Prospective clients

We will hold minimal details such as name, address, contact number and basic policy details on our systems, so that we can contact you regarding your enquiry.

Clients

We collect information about you when you engage us for financial planning and investment management services. This information will relate to your personal and financial circumstances. It may also include special categories of sensitive personal data such as data about your health, if this is necessary for the provision of our contract with you.

From time to time we may be passed information from your other professional representatives, such as lawyers or accountants, where you have given them permission to do so and where it is necessary for the provision of our own services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Children

We will only collect data relating to children where it is strictly necessary for the provision of a contract, under a legal obligation, or where we have consent of the parents/guardians to do so.

Consent can only be given by those with parental responsibility until a child is aged 13, at which point consent must be given by the children themselves.

Children have the same rights as adults over their personal data, therefore the contents of this privacy notice apply equally to minors.

Third party data

Where you pass us information relating to your family members, in relation to the provision of our services, you must direct them to our privacy notice, so that they are aware of how we process and store their data.

Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would be unable to fulfil our legal and regulatory obligations.

In order to meet our contractual and legal responsibilities, we retain contractual data about all services provided to you and any consents you have given, along with records of any communications.

Where special category data is required we'll obtain your explicit consent in order to collect and process this information. Where consent is later withdrawn, we may be required by our regulator to retain details relating to any advice given.

Where we have a legitimate interest, we may also use your information to help us develop new ways to meet our clients' needs.

How will we use your data and who might we share your information with?

If you agree, we may contact you about other products or services that we think may be of interest to you. Where you receive ongoing services this will include items such as our newsletter. We will not share your information for marketing purposes with other companies.

We may use Cookies to track visitor use of our website and to compile statistical reports on website activity. You can set your internet browser not to accept cookies, however some features of our website may not function properly as a result.

In order to deliver our services to you effectively we may send your details to third parties, such as those that we engage for professional compliance, accountancy or legal services, as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where providers or third parties act as a data controller in their own right, they will have their own Privacy Policy and it is important that you read any such documents.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of the prevention of money-laundering and other financial crime, we may send your details to third party agencies for identity verification purposes. Such companies will only process your data in accordance with the agreed purpose.

Transferring data outside of the EEA

We do not transfer your data outside of the EEA. This will only occur where:

- You have given an explicit instruction to us to do so
- The receiver agrees to provide the same or similar protection as we do and that they only use your data in line with our instructions.

How long will we keep your data for?

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods.

We also reserve the right to retain data for longer than the standard periods due to the possibility that it may be required to defend a future claim against us.

We may retain your personal data for longer if it relates to a pension transfer, in which case our Regulator stipulates that it must be kept indefinitely.

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

If you choose to cease your relationship with us, we will notify the relevant providers. Please be aware that some providers will not remove our agency until you appoint a new Adviser, therefore we may still have access to view your information until you do so.

How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information, please email or write to us using the contact details noted below. We will respond to any such request within one month of receipt.

Subject access requests will be dealt with free of charge, except where the request is deemed to be excessive or repetitive, in which case we reserve the right to charge a reasonable fee.

If your personal data is processed by automated means you have the right to ask us to move your data to another organisation. We cannot guarantee that our processing systems will be technically compatible with that of other organisations.

Accuracy of data and your rights

To ensure the highest levels of service possible, we need to keep accurate personal data about you. Please assist us by keeping us informed of any changes to your circumstances and ask us to correct or remove any information that you think is inaccurate.

We shall communicate any rectification of personal data to any recipient to whom it has been disclosed, unless this proves impossible or requires disproportionate effort. We will provide you with details of any such recipients should you request it.

You have the right to object to us processing your data based on legitimate interests. We will comply where justifiable, but not where the data is required for legal purposes.

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. To do so, please contact us by email, post, through your online portal, or via our website.

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

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

Information Commissioner's Office
Wycombe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 (local rate)

You also have the right to a judicial remedy against a legally binding decision of the ICO, where you consider your rights under this regulation have been infringed as a result of the processing of your data.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

6 Edgar House
Worcester
WR1 2LR
worcester@canaccord.com
+44 (0)1905 613 453

Policy changes

We reserve the right, at all times, to update, modify and amend this Policy. We suggest that you review the Privacy Notice from time to time, to ensure that you are aware of any changes we may have made. The most up to date version of our Privacy Notice can always be found on our website, or you can request a hard copy using the contact details above.

We will not change the lawful basis for processing information you have already given to us without your prior agreement.