



LAWTON & TAYLOR

FINANCIAL SERVICES LTD.

Independent Financial Advisers

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Privacy Policy

GENERAL

Lawton & Taylor Financial Services Ltd ("we," "us," "our") is dedicated to safeguarding and valuing your privacy. Functioning as the data controller, we will manage your personal information in compliance with the Data Protection Act 2018, Regulation (EU) 2016/679 (referred to as the "GDPR"), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (with amendments over time), and any pertinent national laws concerning the handling of personal data (collectively referred to as "data protection legislation").

VISITORS TO OUR WEBSITES

We might collect your personal information in these situations:

- When you fill out forms on our website with your name, address, email, and phone number.
- If you tell us about problems on our website, complain, ask questions, or contact us for any reason.
- When you visit our website, we'll keep track of things like where you're coming from, what pages you look at, and what you click on.
- When you share your information with us in any other way on our website.
- We also gather data using Cookies.

We may use your personal data for our legitimate interests to:

- To offer the services or products that you have requested from us.
- To communicate with you about your enquiries, complaints, questions, or any relevant updates.
- To enhance our services, products, and website based on your usage and feedback.
- To fulfil legal and regulatory requirements, such as consumer duty or anti-money laundering regulations.
- To send promotional materials or offers that might be of interest to you, if you have given us consent or if we have a legitimate reason for doing so.
- To ensure the security of our systems and prevent fraudulent activities.
- To analyse trends, gather insights, and conduct research to improve our business strategies.
- To provide assistance and support in case you encounter any issues.

COOKIES

What are Cookies:

Cookies are like digital notes stored on your computer, tablet, or phone. They help websites remember you and your visits. We use them to:

- Learn about your likes, how you use the internet, and what you prefer.
- Study the info to improve our website, products, and services, and to understand what customers want.
- Show you ads that match your interests.
- Make your online experience smoother and more enjoyable.

We may use the following categories of cookies on our website:

- **Essential** – Some of the cookies on our Site are essential for us to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our Site or which allows communication between your browser and our Site. Our cookie preference cookie described in the section “How to turn off cookies” is also an essential cookie. You may not be able to use our Site without these cookies.
- **Analytics** – We use analytics cookies to help us understand how users engage with our Site. An example is counting the number of different people coming to our Site or using a particular feature, rather than the total number of times the site or feature is used. Without this cookie, if you visited our Site once each week for three weeks, we would count you as three separate users. We would find it difficult to analyse how well our Site was performing and improve it without these cookies.
- **User Cookies** – We use cookies to improve your experience by remembering your preferences, so we know how you like to use our Site. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to our Site.
- **Social Sharing** – We use third party cookies to allow you to share content directly on the social networking/sharing sites like Facebook, Twitter or Google+. Examples would be if you wanted to “like” or “tweet” about us or our products or services. Please see our “Third Party Cookies” section below for more details.

Consent

In many situations, we will seek your permission before using cookies on this website. However, it's important to know that we don't need your permission when a cookie is necessary for us to give you a product or service you've asked for.

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings accordingly. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner’s webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

Website Links

Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data, and we do not accept any responsibility or liability for these policies. Please check before you submit your information to these websites.

CUSTOMERS

We need certain information from you in order to offer our services effectively. This includes your name, address, email, phone number, birthdate, national insurance number, and financial details. Sometimes, we might also receive information about credit checks you've done if you've shared them with us.

To properly handle our interactions with you, we'll share your personal information with our employees. We'll hold onto this information for [insert a specific number of] years as per our client file retention policy.

The information you give us will be used to fulfill our obligations outlined in the agreements we make with our customers. We might also share this data with financial institutions, like product providers, lenders, banks, insurers, fund managers, platform providers, and third-party para-planners, who help us provide financial services to our customers.

We will use customer personal data for our legitimate interests including:

- sharing personal data with Tenet for their compliance services and True Potential for their back office systems
- with your consent, marketing our other products and services by mail and email; and
- with your consent, obtaining your sensitive personal data from third parties including your health, ethnic origin, or criminal prosecutions from third parties such as employers and credit reference agencies, fraud prevention agencies and other similar organisations.

- We will not transfer any customer personal data outside the United Kingdom unless permitted to do so by data protection legislation (see the CROSS-BORDER DATA TRANSFERS section of this Privacy Policy).

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

In accordance with data protection legislation, we are required to notify you of the legal basis upon which we process your personal data. We process your personal data for the following reasons:

- for performance of a contract we enter into with you;
- where necessary for compliance with a legal obligation we are subject to; and
- for our legitimate interests (as described within this policy).

We will also process your personal data including personal sensitive data where we have obtained your explicit consent.

DISCLOSURE OF YOUR DATA TO THIRD PARTIES

In addition to the third parties mentioned previously in this policy, we may disclose your personal data to third parties for the following legitimate business purposes:

- staff members in order to facilitate the provision of services to you.
- IT software providers that host our website and store data on our behalf.
- Service providers who provide us with software solutions and platforms to carry out our business and provide services (including, without limitation, open banking services).
- Tenet for our Compliance services, True Potential for our back office support services, and our accountants.
- to a prospective buyer of some or all of our business or assets, in which case personal data including Your Data will also be one of the transferred assets. The recipient of the information will be bound by confidentiality obligations.

We only allow our service providers to handle your personal information if we are satisfied that they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may disclose your personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply our agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will not sell or distribute your personal data to other organisations without your approval.

CROSS-BORDER DATA TRANSFERS

We share your personal information with external third parties in order to provide our services to you. Some of these parties may transfer personal data outside the United Kingdom. We require such third parties to ensure that such transfers take place in accordance with data protection legislation.

Whenever we transfer your personal data out of the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the US, we may transfer data to them if they are registered as being part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the United Kingdom.

DATA SECURITY

Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical, and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access. 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 where we are legally required to do so.

Where we have given you (or where you have chosen) a password which enables you to access your details held with True Potential, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

ACCESS TO, UPDATING, DELETING AND RESTRICTING USE OF YOUR DATA

It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.

Data protection legislation gives you certain rights in relation to your personal data. You have the right to object to the processing of your personal data in certain circumstances and to withdraw your consent to the processing of your personal data where this has been provided.

You can also ask us to undertake the following:

- update or amend your personal data if you feel this is inaccurate.
- remove your personal data from our database entirely.
- send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract.
- restrict the use of your personal data.
- provide you with access to information held about you and for this to be provided in an intelligible form.

We may request specific information from you to help us confirm your identity. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Please send any requests relating to the above to the contact details below specifying your name and the action you would like us to undertake.

RIGHT TO WITHDRAW CONSENT

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please send your request to the contact details below.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be made available on our website <https://www.lawtonandtaylor.co.uk/>. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using

your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

CONTACT US

We have appointed a Steve Lawton to oversee compliance with this privacy policy. If you have any questions, comments, or requests regarding this policy or how we use your personal data please send these to the contact details below. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>

Contact Details:

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