

# Privacy Notice

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## 1. General Information

Chase de Vere Independent Financial Advisers Limited is the data controller of any personal data you supply to us. You can contact us at 60 New Broad Street, London, EC2M 1JJ.

Our Data Protection Officer can be contacted at 6th Floor, 8 Exchange Quay, Salford Quays, Manchester, M5 3EJ or at [dataprotection@chasedevere.co.uk](mailto:dataprotection@chasedevere.co.uk). This privacy notice describes how we will use your personal data and your statutory rights in relation to it.

## 2. How we will use your personal data.

We will use your personal data for:

- Making initial contact with you and obtaining further details of your enquiry
- If you tell us you would like an appointment with an advisor, making that appointment
- In carrying out our “know your client” checks before we enter into a contract with you
- Entering into a contract with you, if you and we agree to do so
- Performing any services, we agree to provide to you

For each purpose, we must be able to rely on a legal ground to justify why we are using your personal data. For the purposes detailed above, the ground we are relying on is that processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.

Where we need to collect Special Categories of Personal Data from you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), we will provide you with additional privacy information at that time to explain this and obtain your consent when necessary to do so.

We may also use your personal data for direct marketing purposes, but only where you have provided your consent to do so. You can ask us to stop sending you marketing messages at any time.

You do not have to provide us with your personal data, but if you do not, we may not be able to carry out our “know your client” checks, so we may not be able to enter into a contract with you and you may not be able to benefit from some of our services if we need to rely on any personal data you have not supplied in order to provide those services.

## 3. Who will we disclose your personal data to?

We may disclose your personal data to the following, but will only do so for the purposes described in this privacy notice. You are entitled to ask us for details of specific disclosures we may make in respect of your personal data. The parties listed below are all located in the UK and will only use your personal data under our strict instructions and are contractually obliged to ensure appropriate security measures are in place.

- Providers of business services to us (including IT service providers and Ipsos, who carry out our customer satisfaction surveys for us)
- Product providers, whose products you may wish to purchase
- Our insurers
- Our reinsurers
- Our professional advisors
- Our statutory auditors
- Our regulator(s)
- Government departments

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- Law enforcement agencies (if required by law to disclose your personal information).

#### **4. How long we keep your personal data**

Except where we are required by our regulator or by law to keep your personal data for longer, we will only keep it for as long as reasonably necessary to fulfil the purposes described in this privacy notice. If you and we enter into a contract, we will keep your personal data for seven years after the end of that contract and we will keep your personal data for marketing purposes only for as long as marketing our services to you continues to be a legitimate interest of ours.

#### **5. Your Rights**

##### **Rights of access**

You have the right to ask us to confirm if we are processing your personal data and if so, to have access to your personal data and other information relating to how we use it. We will let you have a copy of your personal data which is being processed, if you ask us for one. The first copy will be free of charge. We will be entitled to charge a reasonable fee for any additional copies you ask for. We will provide the copy in writing, unless you ask us for it by electronic means. If you do, we will send you the copy personal data by email.

##### **Right to rectification**

If you believe that the personal data we hold about you is inaccurate or incomplete in any way, you have the right to ask us to rectify it or to complete incomplete data and we will do so as quickly as we can.

##### **Right to erasure**

UK legislation gives you the right, in certain circumstances, to require us to erase your personal data. In those circumstances, we will normally erase your personal data as quickly as we can. However, we are not obliged to erase your personal data if we need to retain it in order to comply with a legal obligation to which we are subject. One example of this is where our regulator requires us to retain certain records for a period of time and these records contain your personal data.

##### **Right to restriction of processing**

You also have the right in certain circumstances to restrict our processing of your personal data. Where you ask us to restrict our processing of your personal data, (with the exception of storage) we will only then process it with your consent, in connection with legal claims, for the protection of the rights of another person or for reasons of important public interest and will not lift the restriction on processing without notifying you.

##### **Right to object**

You have the right at any time to object to the processing of your personal data for direct marketing purposes and if you exercise your right to object we will stop processing your personal data for this purpose.

You also have a right to object to any processing of your personal data we carry out on the ground of our legitimate interest unless our reasons for the processing override your data protection rights.

#### **6. Your right to complain to the ICO**

If you are unhappy with the way in which we process your personal data or allow you to exercise your rights as described above or if you believe that we have not complied with our data protection obligations, you have the right to make a complaint to the Information Commissioners Office.