

# **Privacy Notice**

This privacy notice applies to both The Aspire Partnership LLP and The Aspire Consultancy (Bristol) Ltd and explains how we use any personal data we collect about you.

#### Why we need to collect data

From our first meeting, we start collecting data, with a view to entering into a contract to provide financial planning services. The data that we collect 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 contractual, regulatory or legal obligations

# What data is collected

Data collected will relate to your personal and financial circumstances. It may also include details from official documents, about your family relationships and other advisers. We may also collect data when you voluntarily complete client surveys or provide feedback to us.

# Special categories of data

Some data is particularly sensitive and has special treatment in law. In order for us to provide an effective financial planning service, we will often need to collect data that falls under this category, particularly in relation to health. We will only collect or use this type of data after if you explicitly consent to us doing so.

#### Connected individuals and children

We may need to gather information about family members or dependents in order to provide our service to you effectively. In such cases it is your responsibility to ensure you have the consent of the people concerned to pass their information on to us. We can provide a copy of this privacy notice for you to pass on to them.

We will require the consent of a legal guardian and our interaction will be with the legal guardian until the child reaches eighteen, or the age determined by a legal arrangement (for example, Trust, Power of Attorney, Ward of Court) whichever is the later.

# Sharing your data

We may share your personal data between The Aspire Partnership LLP and The Aspire Consultancy Bristol Ltd so that both may provide the services for which you engage us.

We won't share your data for marketing purposes with companies outside our group.

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 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 such as password protection, encryption and secure mail.

We have regulatory obligations in respect of the prevention of money-laundering and other financial crime and use third party agencies for identity verification purposes. We will only share the necessary data required to conduct the search and to fulfil our obligations.

In the performance of our contract, we do use mail software to deliver some communications. The software collects data such as your email address, if the email was opened, how it was opened and what type of device was used e.g. mobile phone, tablet or PC.

# How long do we keep hold of your data?

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We will only keep your data for as long as it is necessary and will review it on a regular basis to ensure it is correctly recorded. At annual planning meetings we take the opportunity to share your most relevant data, e.g. personal, contact, family, income, expenditure and financial so that you can ensure our records are accurate.

The service we provide is long term financial planning, investment advice and tax planning which may include pensions, life assurance products and other tax planning structures, for example ISAs. As you would expect, we need to retain your data throughout our relationship but it is also likely that we will need to retain your data when our contract ends and we are no longer providing you with financial or tax planning. The reason for retaining your data will be based on our business need or for legal or regulatory requirements. For example, we are required to hold pension transfer data indefinitely. Where data is assessed to be inactive, it will be archived.

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 as noted above. In all cases we will respond to your request and inform you of the situation.

# Accessing your data

You have the right to request a copy of the data that we hold about you. If you'd like a copy of some or all of your personal data please email or write to us using the contact details noted.

# Transfer of your data

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

#### Rectification

We have an obligation to ensure that your personal data is accurate and up to date. Please bring our attention to data that you think is incorrect so that we can put it right.

#### Marketing

On occasion we may like to send you information about our products and services which may be of interest to you. Following data protection law, we will only process your data for purely marketing purposes if you have first provided your consent.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted, please contact us.

# Cookies

Our website does not track visitor use with cookies.

# Your right to complain

You can always contact us if you are not happy but 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 Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

# Changes to our privacy policy

We keep our privacy policy under regular review. Any changes will be posted on this page and where appropriate, will be shared with you by email, post or portal. Please note, minor updates are not communicated as a matter of course.

# How to contact us

Please contact us if you have any questions about our privacy policy, data we hold about you or to withdraw marketing consent:

By email at nikki.king@aspirellp.co.uk

- Or write to us at 61 Queen Charlotte Street, Bristol BS1 4HQ
- Or telephone us on 0117 9303510

