



Privacy Notice

June 2025

This document explains what Personal Data we will store and use, and the rights you have in relation to Your Personal Data.

1. Who We are

“We”, “Us” and “Our” in this notice means Integrity Financial Planning Limited, St Margarets, Hambledon Road, Denmead, PO7 6NU, FCA number 670687. It also includes where relevant any policies or products arranged by Us. For the purposes of the Data Protection Act 1998, We are Data Controllers (the holder, user and processor) of the information.

When We say, “you” and “yours” in this notice, We mean anyone whose personal information We may collect.

2. How We collect Your Personal Data

The information We collect about you comes from:

- Information you have given Us as part of the fact find process to allow Us to provide you with advice
- Forms you have completed and given to Us
- Information that you have given Us over the telephone
- Letters and/or emails that you have sent to Us
- Details of any checks We have made to ensure the accuracy of the information We hold

We may also obtain information from third parties, for example, credit checks, information from your employer or other professional advisers (e.g. accountant, solicitor), and searches of information in the public domain such as the voters’ roll. If We use technology solutions to assist in the collection of Your Personal Data for example software that can verify your credit status, We will only do this if We have consent from you for Us or Our nominated processor to access your information in this manner. With regards to electronic ID checks We would not require your consent but will inform you of how such software operates and the purpose for which it is used.

INTEGRITY FINANCIAL PLANNING LIMITED

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Integrity Financial Planning Limited is authorised and regulated by the Financial Conduct Authority. FCA Number 670687

Registered office: St Margarets, Hambledon Road, Denmead, Hampshire, PO7 6NU. Registered in England and Wales. Company Number 6334120.

3. What information We collect about you - “Your Personal Data”

Personal data is defined as any data, which relates to a living individual who can be identified:

- Directly from the information held, e.g. your name, address, national insurance number, or
- Indirectly from the information, when combined with any other information which is already in the possession of, or likely to come into the possession of, the person or organisation holding the information e.g. your employment, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In relation to providing you with financial planning advice, Your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses, and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any existing savings, investments, pensions, mortgages, finance or insurance products and the terms and conditions relating to these

Certain types of data are categorised as "sensitive personal data", for example:

- Racial or ethnic origin
- Physical or mental health/condition
- Sexual life
- Criminal offences (including alleged offences)
- Religious or other similar beliefs of a similar nature

4. Why We may need Your Personal Data

When We speak with you about your financial planning requirements, We do so on the basis that both parties are considering/entering a contract for the supply of services.

To perform that contract, and to provide you with the advice and products you require, We have the right to use Your Personal Data for the purposes detailed below.

- Provision of Financial Services & Advice
- To assist Us in keeping in contact
- To ensure that Our advice is accurate, relevant and suitable
- To help Us sustain a robust ongoing review service
- To enable Us to represent your interests in relation to third-party companies
- To assist your family and dependants (when authorised to do so)

Alternatively, either during initial discussions with you or when the contract between Us has ended for whatever reason, We have the right to use Your Personal Data provided it is in Our legitimate business interest to do so, and your rights are not affected. For example, We may need to respond to requests from mortgage lenders, insurance providers and Our Compliance Service Provider relating to the advice We have given to you, or to contact you to seek feedback on the service you received.

On occasion, We will use Your Personal data for contractual responsibilities We may owe Our regulator The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which We might be subject. In such circumstances, We would be processing Your Personal Data to meet a legal, compliance or other regulatory obligation to which We are subject.

5. Why We may need Your Sensitive Personal Data

Our advice services may need Us to ask you information about your ethnic origin, your health and medical history (**sensitive personal data**). For example, to arrange life insurance and insurance that may assist you in the event of an accident or illness.

We will record and use your sensitive personal data to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice/guidance regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of thirteen, We will record information on Our systems that relates to those children and potentially, to their sensitive personal data. This is used to ensure our advice relating to family protection and legacy planning is suitable to your needs.

The arrangement of certain types of insurance may involve disclosure by you to Us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance related activities such as underwriting, claims and fraud management. We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on sensitive personal data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as Our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

6. What We do with Your Personal Data

While handling Your Personal Data, We will:

- Record and store Your Personal Data in Our paper files, mobile devices and on Our computer systems (*websites, email, hard drives, and third-party cloud facilities*). This information can only be accessed by employees within Our Firm and only when it is necessary to provide Our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to third party providers (e.g. investment company) as required to provide our agreed services, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing Us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that may arise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any advice provided or product/policy you may take out, or to inform you of any developments in relation to those products and/or polices of which We might become aware.

7. Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Third parties who We believe will be able to assist Us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, product/policy providers, Our Compliance Advisers, Product specialists, estate agents, providers of legal services such as estate planners, conveyancing, surveyors and valuers (in each case where We believe this to be required due to your circumstances).
- Where there is a legal requirement to do so – regulatory bodies, relatives, guardians, child support agency, law enforcement agencies,

To provide financial advice and services it may be necessary to share information with third parties to:

- Arrange the financial services products recommended and applied for
- Check the accuracy of the data We hold
- Ensure We meet Our statutory and regulatory legal obligations
- For law enforcement, regulation, licensing, criminal prosecution, and court proceedings
- Recover money owed to Us
- To provide more services through third parties e.g. We may employ agencies to act for Us.
- To maintain the security and safekeeping of the personal data held

We will only use the data We hold to fulfil these functions efficiently and effectively.

Your personal data will not be used for any sales or marketing purposes outside of Us and We will not pass your information onto third parties unless We have your consent to do so, or We are required by law to do so e.g. for fraud or crime purposes.

We do not envisage that the performance by Us of Our service will involve Your Personal Data being transferred outside of the European Economic Area.

8. Security and retention of Your Personal Data

Your privacy is important to Us and We will keep Your Personal Data secure in accordance with Our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party. We have data security procedures and an Information Security Policy to ensure We protect Our manual and electronic data from accidental loss or misuse. We only permit access to information where there is a legitimate reason to do so.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to Us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to Us.

Your Personal Data will be retained by Us either electronically or in paper format for:

If no business is completed	6 months
If only non-regulated business is completed	6 years
If regulated business is completed	Indefinitely

9. Your rights in relation to Your Personal Data

You can:

- request copies of Your Personal Data that is under Our control
- ask Us to further explain how We use Your Personal Data
- ask Us to correct, delete or require Us to restrict or stop using Your Personal Data (details as to the extent to which We can do this will be provided at the time of any such request)
- ask Us to send an electronic copy of Your Personal Data to another organisation
- change the basis of any consent you may have provided to enable Us to market to you in the future (including withdrawing any consent in its entirety)

You can submit a data subject access request to see what information We hold about you. We do not charge a fee for providing you with Your Personal Data. Your request will be dealt within the statutory period of 40 calendar days.

Data subject access requests are subjected to the exemptions of the Data Protection Act 1998

10. How to contact Us in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

Data Protection Officer, Integrity Financial Planning Limited, St Margarets, Hambledon Road, Denmead, PO7 6NU.

If We feel We have a legal right not to deal with your request, or to action, it in a different way to how you have requested, We will inform you of this at the time.

You should also make contact with Us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that We may investigate and fulfil Our own regulatory obligations.

If you have any concerns or complaints as to how We have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.