Client Privacy policy statement

Professional Independent Advisers Ltd (also trading as PIA Wealth Management) is an independent financial advisory company. This privacy policy explains how we use any personal information we collect about you when you use our services. During the course of dealing with us we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (Your Information). We would like to explain to you what we will need to do with Your Information, and the various rights you have in relation to Your Information.

What information do we collect about you?

We collect information about you once you have agreed to use our services and subsequently when we place an order to execute transactions for products or services. We may also collect information about you if you voluntarily complete customer surveys or provide feedback, for example. If and when we use our website to collect information about you the information may be collected using cookies.

Your Information means any information describing or relating to you. Your Information may identify you directly, for example your name, address, date or birth, National Insurance number and the like. Your Information may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with our advice proposition, Your Information 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 pre-existing savings /pensions / investments and insurance products and the terms and conditions relating to these

How will we use the information about you?

We collect information about you to provide you with advice, periodically process your orders, manage your account and, if you agree, to contact you about products and services we think may be of interest to you. When you provide information through our website, we use that information collected from the website to personalise your repeat visits to the website. If you have agreed, we will pass on your relevant personal information other firms party to transactions. We may be required to share your information with our regulators, compliance consultants, credit reference agencies and fraud prevention agencies (including for tax and anti money laundering purposes).

When we speak with you about your financial requirements we do so on the basis that a contract for the supply of services is in place between us. In order to perform that contract, and to arrange the products you require, we have the right to use Your Information for the purposes we set out below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Information 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 product providers relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Information to enable us to meet any contractual responsibilities or for wider compliance with any legal or regulatory obligation to which we might be subject. If this were to arise we would be processing Your Information in order to meet a legal, compliance or other regulatory obligation to which we are subject.

How we use Special Data?

Where you ask us to assist you with your financial needs, in particular life insurance and impaired life products, we will ask you information about your ethnic origin, your health and medical history (Your Special Data). We will record and use Your Special Data in order to make enquiries of product providers in relation to products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 16 it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

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.

Your Special Data and any Criminal Disclosures will be used by us in the same way as Your Information generally, as set out in this Customer Privacy Notice.

When we process your Special Data and any Criminal Disclosures we do so on the lawful basis "Performance of a contract" to be able to provide vital insurance products and as permitted by UK data protection related laws and regulations from time to time. Information on Special Category 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.

How do we collect your information?

We will collect and record Your Information from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to your financial needs /goals. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, 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 Information, such as software that is able to verify your identity on-line or to access your credit status and/or bank account entries, then you will be required to provide your consent for us or our nominated processor to access your information in this manner, and details of how such software operates will be provided to you prior to the activation of the service.

What happens to Your Information when it is disclosed to us?

In the course of handling Your Information we will:

- record and store Your Information in our paper files, mobile devices and on our computer systems (websites, email, hard drives, cloud facilities) and it will be accessed by employees and consultants within, or contractors engaged, by our Firm as necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- submit Your Information to relevant third parties to Investment/Pension Providers, platforms, discretionary fund managers, mortgage lenders and/or insurance product providers, both in paper form and on-line via provider systems, in order to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that providers may raise
- input Your Information, along with full details of the products, discussed with you or which you have taken out, to the computer systems.
- use Your Information for the purposes of responding to any queries you may have in relation to any product or 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

Please note that this sharing of Your Information does not entitle such third parties to send you marketing or promotional messages: it is shared for the purpose of ensuring we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Information being transferred outside of the European Economic Area.

Security and retention of Your Information

Your privacy is important to us and we will keep Your Information secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed or damaged.

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 sent to us.

Your Information will be retained by us either electronically or in paper format for a minimum of six years or may be indefinitely for certain types of business.

Your rights in relation to Your Information

You can:

- request copies of Your Information that is under our control
- ask us to further explain how we use Your Information
- ask us to correct, delete or require us to restrict or stop using Your Information (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 Information to another organisation should you wish
- 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)

How to make contact with our firm in relation to the use of your Information

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:

The Compliance Manager,
Professional Independent Advisers Ltd
Hayward Court
2b Tettenhall Road
Wolverhampton WV1 4SF

Tel: 01902 379900 **Fax:** 01902 379901 **Email**: Compliance@piawm.net

If we feel we have a legal right not to deal with your request, or to action it in 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 Information, 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 Information or Your Special Data/Criminal Disclosures 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.

Marketing

You have the right to ask us not to contact you for marketing purposes at any time - to Opt In – we have included details of how to Opt In within our terms of business agreement.

Opting Out means that we will either remove Your Information from our marketing database or limit our contact with you to the means you specify (for example, by email only), but we reserve the right to retain it for any other purpose explained in this document or as set out separately in our Customer Privacy Notice.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 24 May 2018.