IN PARTNERSHIP
Working Together

WEBSITE PRIVACY NOTICE

Secure Financial Planning Ltd understands its obligations in regards to your fundamental right to a private life and has implemented systems and controls to ensure your rights and freedoms are protected.

Secure Financial Planning Ltd undertakes to meet its obligations under the UK's Data Protection Act 2018, the Privacy and Electronic Communications Regulations and t the UK General Data Protection Regulation (GDPR), and Data Use and Access Act of 2025.

Secure Financial Planning Ltd will support customer understanding by ensuring any communication meets the information needs of customers and any person with a vulnerability is not disadvantaged with the use of format, layout, fonts and language used. Text should be easy to read and without jargon.

This Notice applies to the group company and all regulated and unregulated subsidiary companies.

WHAT PERSONAL DATA DO WE COLLECT?	Secure Financial Planning Ltd will collect the following data, dependent upon the type of enquiry / service / financial product required: • Data about a person's identity such as their name, date of birth and contact details • Data connected to a product or service • Data about your contact with us e.g. meetings, phone calls, emails / letters • Data that is automatically collected e.g. via cookies when you visit one of our websites (please refer to our cookie policy for further information) • Information if you visit our office e.g. visual images collected via closed circuit television (CCTV) • Information classified as 'sensitive' personal data e.g. relating to your health. This information will only be collected and used where it's needed to provide a product or service you have requested or to comply with our legal obligations in matters of employment. • Information you may provide us about other people e.g. joint applicants or beneficiaries for products • Information on children e.g. where a child is named as a beneficiary on the application for a policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender) Different variations of data are required dependent upon the type of enquiry / service / financial product so we may not be required to collect all the data listed above. A privacy notice detailing the specific type of data required will be issued, specific to the type of enquiry.

HOW WE COLLECT YOUR DATA	You directly provide Secure Financial Planning Ltd with the data we collect by the following methods:

	email submission, original physical copy, scanned certified email copy, scanned certified postal copy, telephone conversation, application form for a product or service, meeting with us, registering for one of our events, our websites or via our social media pages.
WHO WILL PROCESS YOUR PERSONAL DATA?	Your personal data will be processed by Secure Financial Planning Ltd. Your personal data is not used in any automated decision making.
WHY IS YOUR PERSONAL DATA REQUIRED?	Your personal data will be required to • reply to your enquiry • enable us to take necessary steps at your request prior to entering a contract for financial services and to perform such a contract. • enable us to take necessary steps at your request prior to entering a contract of employment when applying for a job vacancy and to perform such a contract. Dependent upon the type of enquiry this may include identity and age verification checks, credit checks, preventing and detecting fraud, money laundering or other crimes and any other requirements in accordance with rules set by the Financial Conduct Authority (FCA) or other employment legislation.
WHAT HAPPENS IF WE WANT TO PROCESS YOUR DATA FOR OTHER REASONS?	Though there are some legal exceptions, if we wish to process your personal data for any other unrelated purpose than those, we have informed you about we will notify you.
WHAT ARE THE CONSEQUENCES IF YOU DO NOT PROVIDE YOUR PERSONAL DATA?	Your personal data is essential to enable us to answer your enquiry or to take steps at your request prior to entering a contract or to perform a contract to which you are a party. Without this information we will not be able to proceed any further.
WHAT MAKES THE PROCESSING LAWFUL?	The lawful basis for the processing of your personal data as per Article 6 (1) of the GDPR is necessary for: • Consent. You can remove your consent at any time by contacting our Data Protection Representative (details below). • For the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract • for compliance with a legal obligation to which we are subject • for the purposes of the legitimate interests pursued by us. • For the purpose of recognised legitimate interest.
KEEPING YOUR PERSONAL DATA TO DATE	We will record your data exactly as you provide it. You may ask us to update it at any time and we will action your

	request promptly and notify relevant third parties of any changes.

WHAT ABOUT SENSITIVE PERSONAL DATA?	We only process sensitive personal data • because it is necessary for reasons of substantial public interest • to carry out obligations in the field of employment Sensitive personal data may include data revealing racial or ethnic origin, data concerning health or data relating to criminal convictions or offences. We will only process special category data(sensitive data) where we have an Article 9 exception and DPA 2018's Schedule 1 exemption allowing us to do so.

HOW WILL WE FURTHER USE YOUR PERSONAL DATA (OUR LEGITIMATE INTERESTS)?	• To contact you to ensure that our records of your personal data are correct and up to date; • To respond to questions you may have about employment • For analysis of our website to understand visitor preferences, visitor numbers and which areas of the site are visited most • To pursue debts • To evidence company practices, for example to fulfil our legal requirement to provide independent audit undertakings. • To evidence the standards and processes carried out conform to the company's ethical standards and expectations • To protect the business from risks which might be introduced by an individual • To raise awareness about other opportunities within the company • To provide references to prospective employers when you have named us as a referee. You have the right to object to processing for these purposes and we shall cease unless we can show we have compelling legitimate grounds to continue. Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering: **The purpose test** – to identify the legitimate interest **Necessity test** – to consider if the processing is necessary for the purpose identified **Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

	Where processing is based on recognised legitimate interest, we would not conduct a balancing exercise of legitimate interest assessment.

PROCESSING WHEN PERFORMING A TASK CARRIED OUT IN THE PUBLIC INTEREST	We will use your personal data to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent to ensure this function is not prejudiced. Part of this processing involves verifying your identity using third parties such as GB Group Plc or Creditsafe Business Solutions Ltd.

WHAT PERSONAL DATA IS REQUIRED?	We only collect data that is necessary to carry out the purposes listed above. This includes data you supply and data we receive from reference agencies. Where practical and lawful we will inform you about any of your personal data we receive from third parties that you may be unaware of.

HOW SECURE WILL YOUR PERSONAL DATA BE?	We will ensure that your data is only accessible to authorised people in our firm and will always remain confidential. Appropriate security measures will be in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your data. If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal data, we'll make sure they give reassurances regarding appropriate security measures in place and only process your data in the way we've authorised them to. These organisations won't be entitled to use your personal data for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we've set. Please contact our Data Protection Representative below if you would like further information.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?	We may share your data with: • Appropriate staff such as those who carry out financial or compliance functions. • Organisations that need your data because we are required to provide it by law (e.g. The FCA, HMRC, The Information Commissioner etc). • Organisations that carry out credit references or identity checks such as GB Group Plc or Creditsafe Business Solutions Ltd. These organisations may keep a record of the data and may disclose the fact that a search of its records was made to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors. • Sometimes other authorised firms with specialist advisers, such as pension specialists, who assist us in providing pension schemes. You will be provided with their details if this applies.

	• Law enforcement agencies, courts or other public authorities if we must, or are authorised to by law. • If you are an employee, our parent company to administer various benefits such as life insurance, our bank to enable payment of salaries and benefits and our group pension provider, The Royal London Mutual Insurance Society Limited. • Where we go through a business transaction, such as a merger, being acquired by another company or selling a portion of its assets, your data will, in most instances, be part of the assets transferred. • Companies or organisations requesting a reference where you have named us as a referee. We do not sell your personal data to third parties.

TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE UK / EUROPEAN UNION	We do not usually transfer any of your personal data outside of the UK or EU except when we need to perform pre-contractual measures (credit and identity checks) or because the checks we request are necessary for important reasons of public interest. Some companies, like Creditsafe Business Solutions Ltd, may transfer data outside of the EU to countries which do not, in the view of the EU Commission, offer an adequate level of protection. In such cases Creditsafe encrypts any data it sends to other selected agencies and only transfers information necessary to carry out checks. *(A list of countries used to perform checks include Germany, Netherland, Belgium, France, Sweden, Norway, Finland, Luxembourg, Switzerland, Liechtenstein, Spain, USA, Estonia, Latvia, Lithuania, Poland, Slovakia, Czech Republic, Hungary, Slovenia, Bosnia, Serbia, Montenegro, Croatia, Macedonia, Kosovo, Albania, Bulgaria, Romania, Ukraine, Austria, Denmark, Moldova, Portugal, Italy, Canada, Brazil, Greenland, China, India, Australia, Russia, South Korea, Taiwan, Mexico, South Africa, New Zealand, Hong Kong, UK.)* Furthermore, we will occasionally use third parties for the processing of personal data in third countries. However, we shall put in place appropriate safeguards such as SCC's and IDTAs in compliance with Article 46 to ensure your data is safe before such transfers.

WHAT ABOUT DIRECT MARKETING?	We will use your personal data now and, in the future, to carry out direct marketing activities as these are legitimate interests pursued by us. Sometimes this includes, with your consent, sharing data with product providers for their marketing activities. You can choose which method you'd prefer us to use to contact you (by email, telephone, SMS or post) and **you have the right to object at any time** to the use of your personal data for this purpose and we will cease marketing activity.

VISITORS TO OUR WEBSITE	When someone visits www.inpartnership.net we use a third-party service, Squarespace Analytics, to collect

	standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Squarespace to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be clear about this and explain what we intend to do with it.
WHAT ABOUT COOKIES?	You can read more about cookies on our cookie use page. Privacy Policy 2 — Welcome to In Partnership
HOW LONG WILL WE KEEP YOUR DATA FOR?	The Financial Conduct Authority lays down rules relating to how long your personal data should be held for and we will keep your data to meet these requirements. We will not keep your personal data for longer than is necessary.
REQUESTING A COPY OF YOUR PERSONAL DATA WE HOLD	You may at any time ask for a copy of the personal data we hold about you – **it is your legal right**. We will provide you with a copy of any non-exempt personal data within one month unless we ask you for an extension of time. To protect your personal data, we will ask you to verify your identity before we release any data. We may refuse your request if we are unable to confirm your identity. Information will be provided to you in a concise, transparent, intelligible, and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child.
IMPORTANT RIGHTS	You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of our legitimate interests or in the performance of a task carried out in the public interest. We will no longer process your personal data unless we can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims. You have the right to object at any time to processing your personal data for marketing activities. In such a case we must stop processing for this purpose.
WHAT ARE YOUR OTHER LEGAL RIGHTS?	In addition to the rights above the additional following rights: • You have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning your data • You have the right to receive data you have provided to us in a structured, commonly used and machine-readable format and in a concise, transparent,

	intelligible, and easily accessible form, using clear and plain language. • You have the right to object. • You have the right to data portability • You have the right to lodge a complaint with the regulator (see below). To exercise any of these rights please contact our Data Protection Representative.

HOW TO CONTACT OUR DATA PROTECTION REPRESENTATIVE OR MAKE A COMPLAINT	You can contact our Data protection Representative about any data protection, marketing issue or complaint by: • Writing to: The Data Protection Representative, [add address] • Telephoning: • Emailing:

HOW DO YOU MAKE A COMPLAINT TO THE REGULATOR?	• By writing to: **Information Commissioner's Office,** **Wycliffe House,** **Water Lane,** **Wilmslow,** **Cheshire,** **SK9 5AF** • By telephoning: **0303 123 1113** • By emailing: **casework@ico.org.uk** • By using their website: **https://ico.org.uk/for-organisations/report-a-breach/**