

Privacy Policy

This privacy policy sets out how Mulberry Financial Ltd uses and protects any information that you give Mulberry Financial Ltd.

Mulberry Financial Ltd may change this policy from time to time by updating this page. You should check www.mulberryfinancial.co.uk from time to time to ensure that you are happy with any changes. This policy is effective from 22nd May 2018.

What data we collect

The information we may collect include your name, date of birth, address, email address and telephone number, demographic information such as postcode, preferences and interests, gender, nationality, details of family members, details of your health/medical conditions, job title and employment details, income & expenditure, assets & liabilities, bank details, tax & NI information, financial and personal objectives and details of existing policies you may have.

The source of the personal information

We may collect personal information from you directly, it could be verbally, in writing, by email or via our website. Information may also be generated about you when you use our services.

We may receive information about you from other third party service providers such as insurance companies, accountants, solicitors, other intermediaries or introducers, tracing agents, identity check agencies or organisations used to assist in the prevention and detention of crime. We may combine this information with information you give to us and information we collect about you.

What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- To provide you with financial advice
- To advise on and arrange savings and investments products, pensions, pension transfers, pension opt outs and non-investment insurance contracts.
- To provide ongoing regular reviews of your policy/ies
- When you apply to make changes to your policy/ies
- To notify you about updates or changes to our services
- To follow guidance and best practice under the rules of governmental & regulatory bodies
- For management and auditing of our business operations including accounting
- For analysis and developing statistics
- To share information with insurance providers
- To comply with legal and regulatory obligations

The legal grounds for our processing of your personal information

We rely on the following legal bases to use your personal data:

- Where it is needed to provide you with our products and services such as in assessing the market for a product and/or service that is suitable based on your personal needs and circumstances
- Where it is in our legitimate interests to do so such as to manage your products and services and update you records
- To comply with our legal obligations
- With your consent or explicit consent for some direct marketing communications or for some of our processing of special categories of personal data such as your health.

When we share your personal information with other organisations

We may share information with the following third parties for the purposes listed above:

- product providers
- government and regulatory bodies such as HMRC, the Financial Conduct Authority or the Information Commissioner's Office
- Other organisations who provide services such as compliance, hosting, IT software and document storage providers
- Identity check agencies for ID verification checks (please refer to their privacy notice which can be found at <https://www.transunion.co.uk/legal/privacy-centre?#pc-bureau>)
- To a prospective buyer of the business.

Personal Information transferred outside the European Economic Area (EEA)

Sometimes your personal information may be transferred outside of EEA. If it does so, we will make sure that suitable safeguards are in place, for example by using approved contractual agreements.

Security

We are committed to ensuring that your information is held securely. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

However, you should be aware that the transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

Your rights under data protection laws

Here is a list of the rights individuals have under data protection laws:

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if inaccurate or if incomplete
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased
- The right to request access to your personal information
- The right to move, copy or transfer your personal information
- Rights in relation to automated decision making

You have the right to complain to the Information Commissioner's Office which enforces data protection laws at www.ico.org.uk or by telephoning 0303 123 1113. You can also contact us using the details at the bottom of this document.

Where we are relying upon your consent to process personal data you can withdraw this consent at any time by contacting us.

How long your information is retained by us

We will hold your personal information based on the following criteria:

- For as long as we have reasonable business needs such as managing our relationship with you.
- For as long as we provide products and services to you or someone could bring a claim against us and /or
- Retention periods in line with legal and regulatory requirements or guidance

Controlling your personal information

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

USING OUR WEBSITE

Cookies

We may use "cookies" to keep track of your visit to our website and give you a better browsing experience. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and the service that we provide to you. All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

Social media widgets and applications

Our website may include functionality to enable sharing via third party social media applications, such as the Facebook Share button and Twitter widget. These social media applications may collect and use information regarding your use of our site. Any personal information that you provide via such social media applications may be collected and used by that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

Links to external websites

Our site may, from time to time, contain links to and from the websites of our partner networks or other business links. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or how such websites collect and use your data. Please check these policies before you submit any personal data to these websites.

Contact us

If you have questions about this privacy policy or if you wish to exercise your rights, you can write to Helen Ditcham at Mulberry Financial Ltd, Waters Green House, Waters Green, Macclesfield, Cheshire, SK11 6LF. Alternatively, you can email to helen@mulberryfinancial.co.uk or call us on 01625 427522.

Date of last update: 07 August 2018