

## PRIVACY NOTICE

This privacy notice explains the information that Timothy James & Partners Ltd collects about you (“personal data”) and how we use it. It is intended for individuals whose information we collect and process in the course of providing our services and visitors to our website. This may include clients, prospective clients or their appointed representatives and agents, or an employee or appointed representative of another organisation we have a business relationship with.

### When do we collect information about you?

We collect and process information about you:

- When you enquire about or engage our advice services as stated in our Client Promise.
- During the course of providing our services to you.
- When you contact us for help and information.
- When a third party introduces you to our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

### What information do we collect about you?

The information we collect and process depends on the nature of our relationship with you and may include:

- Your contact information including your full name, date of birth, national insurance number, postal address, phone number and email address.
- Information about your personal and financial circumstances such as employment details, and your income, expenses, assets and liabilities.
- Identification documents such as your passport or driving licence.
- Special category data (sensitive data) such as information about your health.\*

\*Special category data will only be collected and processed as is necessary for the provision of our services and with your explicit consent.

### Information about connected individuals

We may need to gather personal information about your close family members, dependants and any person on whose behalf you are acting or representing in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the individual concerned to pass their information on to us. Where it is possible to do so, we will make a copy of this privacy notice available to them, or you can direct them to a copy of our Privacy Notice on our website.

### Why do we need to collect and use your personal data?

Under the UK General Data Protection Regulation (UK GDPR), we can only use your information if we have a lawful basis for doing so.

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively.

Other lawful bases we will rely on to use your information include:

- Your consent\*
- To comply with our legal obligations. This includes statutory, regulatory and common law requirements, including sharing information with crime agencies and the Police where required to do so.
- For our legitimate interests in managing our business and providing our services to you.

- To protect your vital interests or the vital interests of others. This will only be used where necessary and where no other lawful basis is available.
- Where special category data is required, we'll obtain your explicit consent in order to collect and process this information.

\*Your consent can be withdrawn at any time (subject to our legal obligations) by contacting us on the details below in 'How to contact us'.

### How will we use the information about you?

We collect information about you in order to provide you with the services for which you engage us. We will also use this information for internal training purposes and to comply with our legal and regulatory requirements.

We are committed to performing our contract with you in an efficient and effective manner, and therefore it is in our legitimate interests to utilise new technologies that become available to our industry to assist in providing our services to you (such as assisting in the recording and transcription of meetings, and production of notes and letters). When acting in our legitimate interests, we will ensure we balance this with your interests, rights and freedoms, and therefore we will only use trusted third parties that have stringent data security standards for this purpose. If you have any questions about our use of technology, please contact us.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### Recording communications

During the course of our business, we will record and monitor face-to-face, telephone, video and electronic communications or conversations with you for the following purposes:

- To comply with our legal and regulatory obligations.
- For our legitimate interests in managing our business, operations and contractual obligations such as to ensure we carry out client instructions accurately and for training, development and service improvement.

Copies of recorded communications are available upon request and will be held in accordance with our retention policy.

### Who might we share your information with?

If **you agree**, we may email you about other products or services that we think may be of interest to you. We won't share your information for marketing purposes with other companies.

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,
- IT systems, data management and technical support,
- Arranging financial products for you such as product or platform providers,
- Third party analysis and research tools such as cashflow modelling, forecasts and projections, and
- Product comparison such as performing a search of mortgage or annuity products on the open market based on your information.

To fulfil our obligations in respect of prevention of money-laundering and financial crime we may send your details to third party agencies for identity verification purposes.

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 purpose of 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.

### International transfers of personal data

We may transfer your personal information outside of the UK for outsourced IT services.

If we do, you can expect a similar degree of protection of your personal information that respects the UK and EU laws on data protection.

Where we transfer your personal information to another country outside of the UK or European Economic Area (“EEA”), we will put in place binding rules of engagement or Standard Contractual Clauses (SCC) for data protection within our agreement with the IT provider which ensures that they adhere to UK GDPR requirements and agree to treat the information confidentially and keep it secure.

### How long do we keep hold of your information?

During the course of our relationship with you we’ll retain personal data which is necessary to provide services to you. We’ll take all reasonable steps to keep your personal data up to date throughout our relationship.

We’re also subject to regulatory requirements to retain your data for specified minimum periods.

These are, generally:

- Five years for investment business.
- Three years for mortgage business.
- Indefinitely for pension transfers and opt-out business.
- Three years for insurance business.

These are the **minimum** periods during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it’s in our legitimate interests to do so. We will only rely on this lawful basis where it is necessary for the management of our business, and where we have balanced this with your interests, rights and freedoms. Generally, we will keep data relating to the services we have provided you with for a minimum of six years after our relationship with you has ended (except where specific legal and regulatory requirements apply), after which any data will be anonymised. This is to allow us to respond to any queries or concerns you may raise, and to evidence compliance with our regulatory obligations should this be requested by the Financial Conduct Authority.

If you make an enquiry or are introduced to us, but do not proceed with receiving our advice services or the transaction of business, we will retain your data for six months after which any data will be anonymised. For further information on our retention policy, please contact us.

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.

### What rights do I have in connection with my personal data?

Under data protection law, you have the following rights:

- A right of access – You have a right to request a copy of the information that we hold about you. This is known as a ‘subject access request’.
- A right to rectification – You have a right to request we rectify personal information that you believe is inaccurate or incomplete.
- A right to erasure – You have a right to ask us to erase your personal information in certain circumstances.\*
- A right to restriction of processing – You have the right to object to processing of your personal information in certain circumstances.\*
- A right to object to processing – You have the right to object to us processing your personal information in certain circumstances.\*
- A right to data portability – You have the right to request we transfer your personal information you gave us to another organisation, or to you, in certain circumstances.

\*We will comply with your request subject to the restrictions of our legal and regulatory obligations.

You can exercise these rights free of charge and we have one month to respond to you. Please contact us as per our contact details noted below in ‘How to contact us’.

We have an obligation to ensure that your personal information is accurate and up to date. Please keep us informed if your personal information changes during your relationship with us.

## Marketing

We'd like to send you information about our products and services which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date.

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

## Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

For further information on our policy on cookies please see <https://tjpltd.co.uk/privacy-policy/>

## Other websites

Our website may contain links to other websites. This Privacy Notice only applies to this website so when you link to other websites you should read their own privacy policies.

## What can you do if you are unhappy with how your personal data is processed?

If you have any concerns about our use of your personal information, you can make a complaint to us using our contact details listed below in 'How to contact us.'

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

0303 123 1113 (local rate)

## Changes to our Privacy Notice

We keep our Privacy Notice under regular review, and we'll place any updates on our website or, where appropriate, inform you of any changes when they occur. Please review our website frequently for any updates or changes to our Privacy Notice.

This Privacy Notice was last updated on 29/10/2024.

## How to contact us

If you have any questions about our Privacy Notice or the information we hold about you, please contact us:

**By email at:** [compliance@tjpltd.co.uk](mailto:compliance@tjpltd.co.uk)

**Or write to us at:**

Compliance

Timothy James & Partners Ltd

16 Babmaes Street

St. James's

London

SW1Y 6AH

**If you would like this document in larger print or an alternative format, please contact us on 020 7436 6446 or by email at [info@tjpltd.co.uk](mailto:info@tjpltd.co.uk).**

## INDEPENDENT FINANCIAL ADVISERS

Timothy James & Partners is registered in England & Wales as a private limited company, No. 03138148.

Registered office: 16 Babmaes Street, St. James's, London SW1Y 6AH.

Authorised & regulated by the Financial Conduct Authority, No 179854.

• **Tel:** 020 7436 6446 • **Fax:** 020 7900 2457 • **Email:** [info@tjpltd.co.uk](mailto:info@tjpltd.co.uk) • **Website:** [tjpltd.co.uk](http://tjpltd.co.uk)