



GOODMAN
Chartered Financial Planners
for retirement & beyond

PRIVACY POLICY

INTRODUCTION

This Privacy Policy describes how The Goodman Partnership LLP (The Goodman Partnership) will collect, use and protect your personal information.

OUR PRIVACY POLICY – YOUR RIGHTS, YOUR INFORMATION AND HOW WE USE IT

The Goodman Partnership are committed to protecting your personal information.

Our Privacy Policy contains important information about what personal details we collect, what we do with that information, who we may share it with and why, and your choices and rights when it comes to the personal data you have given us.

We may need to make changes to our Privacy Policy from time to time and will always ensure that the most up to date version is available on our website. This version of our Privacy Policy was last updated on **16 May 2018**.

WHO WE ARE

We are The Goodman Partnership LLP, a Firm registered in the United Kingdom under number OC391820, whose registered office is at 7 Vale Avenue, Tunbridge Wells, Kent, TN1 1DJ. We are Authorised and Regulated by the Financial Conduct Authority (FCA) and our Firm Reference Number is 631469. Our permitted business is advising on and arranging investments and insurance contracts.

The privacy policy applies to The Goodman Partnership and Goodman Care Fees Advisers, a trading name of The Goodman Partnership, and Goodman Employee Benefits, our specialist Employee Benefits division. Our separate Privacy Policy for Goodman Employee Benefits can be found on our website at:

<http://www.goodmanemployeebenefits.co.uk/assets/files/TGP-Privacy-Policy-May18-EBD.pdf>

HOW TO CONTACT US

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact The Data Protection Officer, The Goodman Partnership LLP, 7 Vale Avenue, Tunbridge Wells, Kent, TN1 1DJ (email: dpo@goodmanifa.co.uk).

INFORMATION WE MAY COLLECT, AND USE, ABOUT YOU

We may collect and process information including:

- ▲ about who you are (for example your name, date of birth, contact details and National Insurance Number)
- ▲ relating to your savings, policies or investments (for example your bank account details)
- ▲ about your contact with us (for example meetings, phone calls, letters and emails)
- ▲ details automatically collected (for example, cookies when you access our website)
- ▲ that which is classified as ‘sensitive’ personal information (for example, relating to your health). This information will only be collected and used where it is needed in order to provide the products we have recommended, or to comply with our legal obligations

Partners

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- ▲ about other people (for example, your dependants or beneficiaries). Where the information is regarding children we will only collect and use the information required to identify the child such as their name, age and gender.

COOKIE POLICY

Our website uses cookies to distinguish you from other users, to improve your experience on our website and to recommend content that may be of interest to you.

WHERE WE COLLECT YOUR INFORMATION

We may collect personal information in the course of carrying out work for you through various means, including:

- ▲ meetings with one of our advisers, paraplanners, or client services team
- ▲ telephone conversations with us
- ▲ letters or email correspondence
- ▲ via our website (e.g. on our 'Contact Us' page)
- ▲ application forms you complete for savings, policies or investments
- ▲ external events we arrange (for example, seminars)
- ▲ by operating security policies and procedures in our offices

If you are a member of your employer's Workplace pension scheme, Group Life, Income Protection or Private Medical Insurance scheme, the information we collect will have been provided by them on your behalf.

We may also collect personal information about you from commercially or publicly available sources, for example, to check or improve the information we hold, particularly if we are unable to contact you directly.

WHAT WE COLLECT AND USE YOUR INFORMATION FOR

We take your privacy seriously and will only collect and use your personal information where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- ▲ you have given us your consent to send information to you about products and services which we believe may be of interest and benefit to you; or
- ▲ it is necessary for us to provide the savings, policies or investments we have recommended; or
- ▲ it is necessary for us to meet our legal or regulatory obligations; or
- ▲ it is in the legitimate interests of The Goodman Partnership. For example, to deliver appropriate information, guidance or advice so that you are aware of the options available when considering how to get the best outcome from your savings, policies or investments; or
- ▲ it is in the legitimate interest of a third party. For example, sharing information with your employer in respect of a claim on their Group Life or Income Protection scheme

If you do not wish us to collect and use your personal information in these ways, we may be unable to provide you with our services.

WHO WE MAY SHARE YOUR INFORMATION WITH

We may share your personal information with third parties for the reasons outlined above. These may include:

- ▲ service providers, support services and organisations that help us to market our services and third parties instructed to enable us to fulfil our contractual obligations to you and/or our clients
 - ▲ insurance companies, product providers and investment houses (including as permitted by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 which, for the purposes of preventing money laundering or terrorist financing, may require us to disclose your personal data)
 - ▲ your employer, but only in respect of an employer sponsored scheme
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- ▲ our regulators and supervisory authorities (including The Financial Conduct Authority and the Information Commissioner's Office for the UK)
- ▲ law enforcement, credit and identity check agencies for the prevention and detection of crime
- ▲ our Professional Indemnity insurers
- ▲ other professional advisors or third parties (including accountants & technical experts) with whom we engage as part of our work for our clients or who our clients separately engage in the same context
- ▲ our data processors providing email security, data governance, archiving and other IT and business support services
- ▲ our email marketing platform provider and our website platform provider
- ▲ analytics and search engine providers that assist us in the improvement and optimisation of our website
- ▲ any third party you ask us to share your data with.

We will never sell your personal information to someone else. We will only share your personal data in compliance with the European Data Protection Legislation.

Third party internet sites that you can link through to from our website will not be covered by our Privacy Policy and The Goodman Partnership accept no responsibility or liability for any actions that these sites may perform. We advise that you should check the policy of each site that you visit.

WHERE YOUR INFORMATION MAY BE PROCESSED

Your personal data is processed in the UK and European Economic Area (EEA). If we need to share your personal data with a recipient outside the EEA (e.g. a professional advisor or third party engaged by us or you as part of our work under an engagement letter) we will ensure we do so in compliance with European Data Protection Legislation, including where applicable by ensuring that the transfer is necessary to perform a contract in place with you or a contract entered into in your interests. If these transfers affect you, you may contact us to obtain more precise information and a copy of relevant documentation.

HOW WE PROTECT YOUR INFORMATION

We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. All personal information you register on our website will be located behind a firewall. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot absolutely guarantee the security of your data.

HOW LONG WE KEEP YOUR INFORMATION

We will keep your personal information stored on our systems only where it is necessary to provide you with our services and in accordance with our Client Agreement, and where we have a legitimate interest.

We may also keep your data after this period but only where required to meet our legal, regulatory or technical obligations.

The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you.

Please refer to our Data Retention policy for full details – this is available from our Data Protection Officer (dpo@goodmanifa.co.uk).



YOUR INFORMATION RIGHTS

European Data Protection Legislation gives you the right to access information held about you. You have a right to receive clear and easy to understand information explaining; what personal information we hold; why we hold this information; who we share this information with. We do this in our Privacy Policy.

You have the right to access the personal information we hold on you. You may do so by submitting a Data Subject Access Request (DSAR) to The Data Protection Officer, The Goodman Partnership LLP, 7 Vale Avenue, Tunbridge Wells, Kent, TN1 1DJ.

We will ask you to provide proof of identity before we show you your personal information – this is so we can prevent unauthorised access.

For any DSAR that is deemed excessive or especially repetitive, we may charge a ‘reasonable fee’ for meeting that request. Similarly, we may charge a reasonable fee to comply with requests for further copies of the same information. (That fee will be based upon the administrative costs of providing the information).

You have the right to request rectification of your personal information. If your information is inaccurate or incomplete, you can request that it is corrected.

You have the right to request the erasure of your personal information. You may request that your information is deleted or removed if there is not a compelling reason for The Goodman Partnership to continue to have it.

You have the right to restrict processing of your personal information for certain reasons. This means that we are still permitted to hold your information but only to ensure that we do not use it in future for the reasons you have restricted.

You have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to move that data to another business or organisation.

You have the right to object to The Goodman Partnership processing your personal information based on our legitimate interests, for direct marketing and if we use data for scientific/historical research and statistics.

You can exercise these rights at any time by writing to The Data Protection Officer, The Goodman Partnership LLP, 7 Vale Avenue, Tunbridge Wells, Kent, TN1 1DJ (email: dpo@goodmanifa.co.uk).

HOW TO MAKE A COMPLAINT

We will always strive to collect, process and store your personal information in accordance with data protection laws. If at any time you do not think that we have dealt with your information as set out in our Privacy Policy, please write to The Data Protection Officer, The Goodman Partnership LLP, 7 Vale Avenue, Tunbridge Wells, Kent, TN1 1DJ (email: dpo@goodmanifa.co.uk).

You also have the right to make a complaint to the Information Commissioner’s Office. For more details please visit the ICO website.
