

# **GRS Financial Consultants Ltd**

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## **Privacy Policy**

### ***How we use your information***

This privacy notice tells you what to expect when GRS Financial Consultants Limited collects personal information. It applies to information we collect about how:

We may collect and process the following data about you;

Information that you provide by filling in forms on our website [www.grsfinancial.co.uk](http://www.grsfinancial.co.uk)

Information that you provide to us by telephone; e-mail or face to face.

If you contact us, we may keep a copy of that correspondence.

### ***Visitors to our website***

When someone visits [www.grsfinancial.co.uk](http://www.grsfinancial.co.uk) we use a third party service, Google 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 Google 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 up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### ***Use of cookies by GRS Financial Consultants Limited***

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The paragraph below explains the cookies we use and why.

"These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited."

### ***Security and performance***

GRS Financial Consultants Limited uses a third party service to help maintain the security and performance of the GRS Financial Consultants Limited website. To deliver this service it processes the IP addresses of visitors to our website(s).

### *People who email us*

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### *People who make a complaint to us*

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We usually have to disclose details of the complaint to our Professional Indemnity Insurance Broker and Insurer.

We may be required to provide a copy of our file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint case.

We are required to disclose to The Financial Conduct Authority (FCA) high level analytics concerning the number and nature of complaints received. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained indefinitely from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

### *People who use our services*

GRS Financial Consultants Limited provide a range of Financial Services to Data Subjects. We process data provided by the data subject and other sources in order to deliver the appropriate products and services to Data Subjects.

We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested GRS Financial Consultants Limited Care Service to carry out a survey to find out if they are happy with

the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

### ***Joint Policies***

In the event that you hold a joint policy either with a spouse, dependant, as a trustee or in any other capacity, your service agreement with GRS Financial Consultants Limited will allow the details of this contract to be discussed and provided with the joint policy holder unless your express consent is provided to the contrary.

### ***Use of data processors***

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Our Data processors / Third parties that we use include:

Banking arrangements:	Barclays Bank plc
Legal opinion where required:	T.A. Capron & Co Solicitors LLP
Regulatory and Compliance opinion where required:	Compliant Solutions Limited
Sanctions and PEPs checking (Anti Money laundering):	Creditsafe UK Limited
Client Money and Audit requirements:	Buckley Watson Chartered Accountants
Your personal files:	Linden House
Research:	Defaqto Group Ltd
	Adviser Asset Ltd
	Selectapension Ltd
	Financial Express Investments Ltd
	Iress Portal Limited

### ***Your rights***

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

From 25 May 2018 the General Data Protection Regulations (GDPR) come into force.

### ***Access to personal information (Portability)***

Data Subjects may submit a Subject Access Request - in order to obtain a copy of personal data that we hold about them in a structured and portable manner. All SAR requests should be sent to the Data Protection Officer Bradley Smith via email: [brad@grsfinancial.co.uk](mailto:brad@grsfinancial.co.uk)

### ***Confirmation of whether, and where, the controller is processing their personal data***

GRS Financial Consultants Limited is the Data Controller and a Processor. GRS Financial Consultants Limited undertakes data processing within the EEA.

### ***Right of Data subjects to erasure (Right to be forgotten)***

Data Subjects may notify the Firm if they wish to exercise their right to erasure. Such a withdrawal of Consent does not affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact.

GRS Financial Consultants Limited may retain a copy of any personal data if maintaining this information is necessary for the establishment for processing, exercise or defence of legal claims.

### ***Right of rectification***

GRS Financial Consultants Limited will seek to ensure that inaccurate or incomplete data will be rectified. Data Subjects have the right of rectification.

### ***Right to object to processing for the purposes of Direct Marketing***

Data Subjects may notify the Firm if they wish to exercise their right to be removed from any Direct Marketing activities. GRS Financial Consultants Limited may still contact the Data Subject in order to fulfil any contractual obligations concerning the policies and services provided.

### ***Data Destruction Policy***

In relation to retaining and storing your data we will keep client records in relation to the advice provided to you and the transactions undertaken upon your behalf indefinitely. This is to ensure that we continue to maintain records of the services provided to you under regulatory rules and for both your and GRS's Financial Consultants Limited protection.