

Privacy Notice

If you would like this document in larger print or in another format, please contact us.

This privacy notice explains how we use any personal information we collect about you.

What information do we collect about you?

We collect information about you when you engage us for financial advice and investment management services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services. These categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health.

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

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information.

Information about connected individuals

We may need to gather personal information about your close family members and dependants 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 people concerned to pass their information on to us. We will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

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

We must have a lawful basis to process your personal data. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

We have a contractual obligation

This is the primary legal basis that we intend to use for processing your data. The personal information that we collect about you is essential for us to be able to effectively carry out the services that we have agreed to deliver to you.

We have a legal obligation

Sometimes, collecting personal data is needed to meet our legal and regulatory obligations. For example, UK anti money laundering legislation may require us to collect personal information to verify your identity.

We will obtain your consent

Special category data, such as that relating to health matters, is often required to provide our services. When this is required, we will obtain your explicit consent to collect and process this information.



From time to time, we may wish to contact you to offer additional products or services which may be of interest to you. To do this, we will obtain your consent.

You may withdraw your consent at any time by notifying us at our main business address.

We have a legitimate interest

We rely on legitimate interest to retain relevant data for the purposes of assessing the appropriateness of our services, defending future complaints, and meeting our Professional Indemnity Insurer's expectations.

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.

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 will not 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 as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data, we will have a contract in place with them to ensure that the nature and purpose of the processing are 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 is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit, for example by using secure file sharing portals or encrypting the files with a password.

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

How long do we keep hold of your information?

During the course of our relationship with you, we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date during this time.

We are also subject to regulatory requirements to retain your data for specified minimum periods. These are:

- 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 **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 is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than fifteen years after our relationship with you has ended, except in the case of pension transfers and opt-outs as noted above.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us using the contact details noted below.

When your personal data is processed by automated means, you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

Marketing

We would like to send you information about our products and services which may be of interest to you. If you have 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.

Other websites

Our website may at times contain links to other websites. This privacy policy only applies to our website. If accessing other websites you should read their own privacy policies.

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

You also have a right to lodge a complain with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF



Changes to our privacy policy

We keep our privacy policy under regular review, and we inform you of any changes when they occur. This privacy policy was last updated on 05/11/2024.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

- By email at sevans@thomsontyndall.com
- Or write to us at: Ms Stephanie Evans, 1 The Sanctuary, London, SW1P 3JT.

Consent

We have provided you with a copy of our Privacy Notice which provides information about the nature of our personal data processing activities and includes details of our retention and deletion policies as well as your rights of access to the personal information that we hold on you.

Sensitive personal data

As explained in our Privacy Notice there are certain categories of personal data that are sensitive by nature.

Depending on the nature of the products and services that you engage us for we may need to obtain your sensitive personal data particularly in relation to health. In the case where we need to process special category (sensitive) data as described above, we require your consent by indicating your agreement to the following statement:

I / we consent to the processing of sensitive personal data as far as it is necessary for the services I / we require from Thomson Tyndall.

Client one name:	
Client one signature:	
Date:	

Client two name:	
Client two signature:	
Date:	

Please note that you may withdraw this consent at any time by notifying us at our main business address.

Marketing

From time to time we may wish to contact you to offer additional products or services which may be of interest to you. In order to do this, we require your consent by agreeing to one or all of the options:

Client one: I consent to be contacted for marketing purposes by:

Email	<input type="checkbox"/>
Telephone	<input type="checkbox"/>
Post	<input type="checkbox"/>
Thomson Tyndall Portal	<input type="checkbox"/>

Client one name:	
Client one signature:	
Date:	

Client two: I consent to be contacted for marketing purposes by:

Email	<input type="checkbox"/>
Telephone	<input type="checkbox"/>
Post	<input type="checkbox"/>
Thomson Tyndall Portal	<input type="checkbox"/>

Client two name:	
Client two signature:	
Date:	

Please note that you may withdraw this consent at any time by notifying us at our main business address.