

Privacy Notice

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

We take your privacy seriously and are committed to handling your personal information lawfully, fairly and transparently under the UK GDPR and the Data Protection Act 2018.

This privacy notice explains how we collect, use, share, store and protect your personal information, including where we use artificial intelligence (AI).

What personal information we collect

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 and with your explicit consent. These categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health.

To keep accurate records and meet regulatory requirements, we also keep records of emails, telephone calls and meeting notes.

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?

UK data protection law requires us to have a valid legal reason – called a *lawful basis* – for collecting and using your personal information. The UK GDPR sets out the different lawful bases. 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.

You can read more about data protection rights, including any exceptions, on the ICO's website: [For the public | ICO](#).

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 the prevention of money-laundering and other financial crime, we use third-party agencies for identity, fraud and anti-money-laundering checks.

We never sell your personal information to anyone.

Using artificial intelligence (AI)

We may use AI tools to help us review information more efficiently. AI tools may be used for recording and transcribing meetings, drafting or summarising internal documents such as meeting notes, and

identifying patterns or errors in data. We do not use any systems for making automated decisions. All outputs from AI are subject to human review and approval before being used or relied on.

Where AI tools are used, we will ensure only the minimum necessary personal information is processed and we will anonymise personal information where possible. Processing will only occur in regulated systems complying with Data Protection regulations.

We will have signed data protection agreements with suppliers to ensure personal information is protected and not transferred outside the UK and EEA without appropriate safeguards in place.

We do not use AI tools that use your personal information to train public models.

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.

We also have to keep identity verification documents required under the UK anti-money-laundering rules for at least 5 years, should our relationship with you end or 10 years when our relationship is ongoing. Because these are legal requirements, we cannot delete your information before these time periods have passed.

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 the 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 the 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

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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 25/02/2026.

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.

Special category data

As explained in our Privacy Notice there are certain categories of personal data that are considered particularly sensitive and in need of greater protection. These are referred to as “special category data”.

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 explicit consent. Signing the statement below will allow us to collect and process your special category data.

Please note that you may withdraw this consent at any time by notifying us directly by phone, email or by post at our main business address.