

## Privacy Notice

This Privacy Notice sets out how we (Anthony & Co Asset Management LTD), are fully committed to protecting your personal data. We are authorised and regulated by the Financial Conduct Authority and you can check our status at [www.register.fca.org.uk](http://www.register.fca.org.uk) under the firm reference: 740354. Our office is registered at 4 Troon Close, Bedford, MK41 8AY. This policy explains how we collect and use personal data, which is consistent with our legal obligations and your legal rights. Please read this policy carefully. When we use 'we', 'our', or 'us' in this policy, we mean Anthony & Co Asset Management LTD. When we use 'you, your' in this policy, we mean our Customers, Employees, Contractors, Applicants, Partners and Suppliers.

### We will collect and process data from the following data subjects:

- Customers, Employees, Contractors, Applicants, Partners and Suppliers

### Data we collect from you

Data subjects	Types of data collected
Customers Employees Contractors Applicants	Contact details, personal information, financial information, lifestyle information, insurance information, regulatory information, employment information (past and present). We may need to collect "sensitive" data, such as information about your health, in particular when providing products such as life insurance. Where such data is provided to us, we'll only use it for the specific purposes set out in this notice.  When browsing our website, we may collect information relating to the user journey including users' IP addresses, browser name, type of computer, etc. Some of this information is collected through anonymised tracking cookies and functional system cookies.
Partners and Suppliers	Company information, contact details, financial information and regulatory information.

### How we collect data

Data subjects	Where data comes from
Customers	From enquiry forms, introducers, email and letters, telephone calls, social networks, insurance companies and agents, government agencies, credit reference agencies, financial institutions, and fraud prevention agencies.
Employees Contractors Applicants	Application forms, online enquiry forms, jobsites and recruitment agencies, social networks, CVs, emails and letters, interviews, government agencies, financial institutions, credit reference agencies, fraud prevention agencies and previous employers.
Partners and Suppliers	During telephone calls, emails and letters, in person, when registering for our services, website enquiries, government agencies, fraud prevention agencies, credit reference agencies, social networks and introducers.

### Why we collect your data

We collect your data for the various reasons shown below:

- We are processing your data under the authority of our Partners, or;
- It's necessary for our performance of a contract with you, or;
- You have consented to our use of your personal data for one or more specific reasons, or;
- We have a legal obligation to process your data, or;
- It's in our legitimate business interests to use it.

## Legal grounds for processing your data

### Customers

*Consent:* Assessing whether you are eligible for products from our lenders and providers. Applying to a lender or provider (which may include automated decision making) and where you have asked us to take specific steps before entering into a contract with a lender or provider. Determining our performance through surveys and offering additional services or products that may be of interest to you. To contact you at the end of any preferential rate period on your mortgage or to consider insurance in relation to your mortgage products.

*Contract:* To perform the necessary actions to deliver our commitment under the contract we have with you. Using service providers to support our business so that they can provide services to us and/or to you on our behalf.

*Legal Obligations:* For fraud/crime investigation and prevention and for legal and regulatory purposes.

*Legitimate Interests:* As part of the defence of a legal claim. Using data for market research and the development of new systems and/or products to suit consumer needs.

### Employees, Contractors, Applicants

*Contract:* To perform necessary actions to deliver our commitment under the contract we have with you.

*Legal Obligations:* For fraud/crime investigation and prevention and for legal and regulatory purposes.

*Consent:* Sharing subjective data with government agencies and health professionals before and during employment. Determine our performance through surveys.

*Legitimate Interests:* As part of the defence of a legal claim. Using data for market research.

### Partners and Suppliers

*Contract:* To perform necessary actions to deliver our commitment under the contract we have with you.

*Legal Obligations:* For fraud/crime investigation and prevention and for legal and regulatory purposes.

*Consent:* Determine our performance through surveys and offering additional services or products that may be of interest to you.

*Legitimate Interests:* As part of the defence of a legal claim. Using data for market research and the development of new systems and/or products to suit consumer needs.

## The rights you have regarding your personal data

- You have the right to be informed on how we hold and deal with your personal information. This notice fulfils that obligation.
- You have the right to ask for a copy of personal information we hold about you or ask for your information to be corrected.
- You have the right to ask us to transfer your personal information to another party.
- You also have the right to ask us to delete the information we hold about you, prevent us from processing your information and object to us processing your information (withdraw consent). Please note, these rights may not apply where our basis for processing is by legal or contractual obligations.
- Although we do not carry out automated decision making, lenders and providers we deal with may do so. Where you have agreed for us to process your personal data as set out in this document, you are also agreeing to us passing your personal data onto lenders to carry out such actions. You have certain rights regarding automated decision making and these will be explained to you before such action takes place.

## How long we will keep your personal data

In respect of customer, partner and supplier data, we do not keep your personal data for any longer than is necessary to fulfil the contractual obligation and will only keep necessary information for longer when it is required by law.

In respect of employee data, we do not keep your personal data for any longer than is necessary to fulfil the contractual obligation and will only keep necessary information for longer when it is required by law. We will keep data, for an extended period of time, so that we can provide any necessary references required by the data subject. This data will not be processed for any other reason beyond the term of employment.

## Transferring data

We do not transfer any of your personal information outside of the EEA.

## **Who we share your information with**

- Third party providers of product data (known as sourcing systems or portals) so that we can research and identify products that meet your needs and for which you are eligible and can offer you other products that we believe may be of interest to you. As part of our security and back up procedures we will share information with IT system providers.
- Credit reference agencies, fraud prevention agencies and sanctions agencies, so that we can verify your identity using the information you have provided us with and to comply with anti-money laundering requirements.
- Lenders, insurers and third-party processors (a portal or another intermediary so that we can add your information onto shared registers to prevent fraudulent applications and claims. For insurance purposes, we will pass your details to the insurer or third-party processor gathering information on behalf of the insurer.

## **How and where we store your data**

Data security is very important to us, and we have physical, technological and organisational measures in place to protect your data to help prevent loss, theft and authorised access/use. Steps we take to secure and protect your data include encrypting emails or using secure data transmission portals, password protecting computers and storing hardcopies of data in a locked cabinet. We also require our Partners and Suppliers to ensure they keep up with safeguarding data and comply with all the required laws.

## **If our business ownership changes**

If our ownership changes in anyway, any personal information that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use that data only for the same purposes for which it was originally collected by us.

## **Changes to our Privacy Notice**

From time to time this statement may be updated in light of regulatory changes or changes in the manner we operate. With this in mind we suggest you review this statement at regular intervals. If any changes are significant we will endeavour to notify you and ensure your ongoing consent and/or acceptance. This Privacy Notice was last updated on 24 May 2018.

## **Feedback or Questions**

If you have any questions or would like more information, please contact us either by telephone, email or in writing.

- Data Protection Officer Antonio Iacofano, 4 Troon Close, Bedford, MK41 8AY.
- Email at [tony@anthonyandco.o.uk](mailto:tony@anthonyandco.o.uk)
- Telephone 01234 309385