

# Privacy Policy

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Longmuir Financial Planning Ltd Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

## **Contact details**

**Post** - 33 Weavers Crescent, Kirkcaldy, Fife, KY2 5LN

**Telephone** - 01592331025

**Email** - [elliott.guthrie@longmuirfp.com](mailto:elliott.guthrie@longmuirfp.com)

## **What information we collect, use, and why**

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Gender
- Occupation
- Date of birth
- Marital status
- Third party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Employment details (including salary, sick pay and length of service)
- Health information (such as medical records or health conditions)
- Information relating to compliments or complaints
- Audio recordings (eg calls)
- Records of meetings and decisions
- Account access information
- Website user information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We also collect or use the following information for the **operation of client or customer accounts**:

- Health information

We collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes**:

- Names and contact information
- Client accounts and records
- Financial information eg for fraud prevention or detection

We also collect or use the following information **for the prevention, detection, investigation or prosecution of crimes**:

- Racial or ethnic origin

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences

We collect or use the following personal information to comply with legal requirements:

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations

We also collect or use the following information to **comply with legal requirements**:

- Racial or ethnic origin
- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Account information
- Purchase or service history
- Customer or client accounts and records
- Financial transaction information
- Correspondence

We also collect or use the following information for **dealing with queries, complaints or claims**:

- Racial or ethnic origin

## **Lawful bases and data protection rights**

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## **Our lawful bases for the collection and use of your data**

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you
- From third parties you have authorised to provide us with information

### **How long we keep information**

We keep your data only as long as necessary to comply with FCA regulations, and to maintain a record in the event of a complaint. This means that some of your data may need to be kept indefinitely in order for us to comply with legislation.

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

Data processors

#### **ValidPath Limited**

This data processor does the following activities for us: ValidPath provide regulatory and support services to Longmuir Financial Planning Ltd, and to do this and comply with legislation, they require access to client records.

Others we share personal information with

- Other financial or fraud investigation authorities
- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Regulatory authorities
- Organisations we're legally obliged to share personal information with
- Professional consultants

**How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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>