

Privacy and Cookie Policy

Introduction

Welcome to Crowe Financial Planning UK Limited privacy and cookies notice. Crowe Financial Planning UK Limited respects your privacy and is committed to protecting your personal data.

This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), as well as where we interact in the course of our business, and tell you about your privacy rights and how the law protects you.

During our working relationship, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (your personal data).

This document is important as it allows us to explain to you what we will need to do with your personal data, and the various rights you have in relation to Your Personal Data.

You can [download a pdf version of the policy here](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Crowe Financial Planning UK Limited collects and processes your personal data through your use of our website, including any data you may provide through our website when you utilise our 'contact us' form.

This privacy notice also provides information as to how Crowe Financial Planning UK Limited collects and processes your personal data during the course of our business, including any data you may provide during our meetings, by phone, email and post – as well as at networking events.

Our website is not intended for children and we do not knowingly collect data relating to children. However, if you have parental responsibility for children under 13 years of age, it is very likely that we will record information on our systems that relates to those children if necessary in the course of us providing advice to you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Crowe Financial Planning UK Limited is the controller and responsible for your personal data (collectively referred to as "Crowe Financial Planning UK Limited", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relations to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.



Contact details

Our full details are:

- **Full name of legal entity:** Crowe Financial Planning UK Limited
- **Name or title of Data Privacy Manager:** Phil Smithyes
- **Email address:** crowefpuk@crowe.co.uk
- **Postal address:** R + Building, 2 Blagrave Street, Reading, Berkshire. RG1 1AZ
- **Telephone number:** 0118 959 7222

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 1 September 2022 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

In the context of providing you with assistance in relation to your investment/mortgage/finance and/or insurance requirements, the personal data that we may collect, use, store and transfer about you has been grouped together as follows:

Identity Data includes title, first name, last name or company, gender, nationality, marital status and documents necessary to verify your identity, date of birth and National Insurance number. We sometimes request, or you provide us with, special category personal data, meaning ethnicity, sexual orientation and health information (health status and history, details of treatment and prognosis, medical reports) in order to provide comprehensive advice.

In addition, we may collect details of:

- personal income / expenditure / financial details of plans and policies held / legacy wishes / adverse credit
- any historic or current criminal convictions or offences
- vulnerability and
- details of your dependents and/or beneficiaries under a policy. **If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described above.**
- **Contact Data** includes billing address, delivery address, home addresses, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details, employment and remuneration information (including salary/bonus schemes/overtime/sick pay/other benefits), employment history, bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents. Any pre-existing investment/mortgage/finance and/or insurance products and the terms and conditions relating to these.)
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact, Financial, Transaction, Profile and Marketing and Communications data by filling in forms (online or on paper), during meetings or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply/request our services;
- create an account or purchase products on our website;
- utilise our 'refer a friend' function on our website;
- log in to our website via social media;
- subscribe to our services or publications;
- join a loyalty programme;
- request marketing to be sent to you;
- leave a comment on our website;
- enter a competition, promotion or survey; or
- give us some feedback
- contact us with an enquiry or to report a problem
- work as a subcontractor for us.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns, including contact data where tasks are carried out via our website but remain uncompleted, such as incomplete orders or abandoned baskets. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our **cookie policy** at the end of this privacy notice.

Third parties or publicly available sources.

We may also obtain personal data from other sources in the course of providing our *intermediary services*. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From lenders
- From product providers/ scheme administrators
- From other professionals such as your Solicitor or Accountant
- From identification and verification checking agencies



We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - (a) analytics providers, such as Google Analytics based in the US;
 - (b) advertising and affiliate networks; and
 - (c) search information providers
- Your employer and credit checking agencies if applicable
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- Identity and Contact Data provided at events such as business cards or attendee lists.
- Identity and Contact Data from data brokers or aggregators based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligations (eg anti-money laundering)
- Where processing is necessary for the purposes of preventative or occupational medicine, medical diagnosis and the provision of health treatment. (Article 9(2)(h) for health special category data)
- Where processing is necessary for the purposes of providing your special category data to make enquiries of insurance/investment providers in relation to financial and insurance products that may meet your needs, and to provide you with advice/guidance regarding the suitability of any product that may be available to you. (Article 9(2)(a) Explicit Consent for special category data such as ethnicity and sexual orientation – “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.”)

We rely on consent as one of the legal bases for processing your personal data where you have given it. In relation to sending third party direct marketing communications to you via email or text message we will only rely upon consent. You have the right to withdraw consent to marketing at any time by contacting us.



What happens to Your Personal Data when it is disclosed to us?

In the course of handling your personal data, we will:

- Record and store your personal data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit your personal data to Product Providers and/or Insurance Product providers, both in paper form and online via a secure portal
- The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise
- Use your personal data for the purposes of responding to any queries you may have in relation to any investment/mortgage/finance product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or polices of which we might become

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer.	(a) Identity (b) Contact	- Performance of a contract with you
To process and deliver services including:	<ul style="list-style-type: none"> • Keeping you informed • Manage payments, fees and charges • Collect and recover money owed to us • Assist fraud prevention and detection 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communication (f) Legal <ul style="list-style-type: none"> - Performance of a contract with you - Necessary for our legitimate interests (to recover debts due to us) - To comply with legal obligations
To manage our relationship with you which will include:	<ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey • Service announcements • Providing you with any information 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Marketing and Communications <ul style="list-style-type: none"> - Performance of a contract with you - Necessary to comply with a legal obligation - Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications 	<ul style="list-style-type: none"> - Performance of a contract with you - Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, setting default options for you)	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> - Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) - Necessary to comply with a legal obligation

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. This can be done by using a pixel or cookies which help social media.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	- Necessary for our legitimate interests (to define types of customers for our products and services to keep our website updated and relevant to develop our business and to inform our marketing strategy)
To use our database and data analytics to improve our website, services, marketing, customer relationships and experiences; and for market research, statistical and survey purposes.	(a) Technical (b) Usage (c) Contact (d) Identity (e) Marketing and Communications	- Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products and services and offers that may be of interest to you, such as in our direct marketing activities.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	- Necessary for our legitimate interests (to develop our services and grow our business) or - Consent
To gather CVs and other such information in respect of the recruitment process	(a) Identity (b) Contact	- Fulfilment of contract - Necessary for our legitimate interests (to grow our business)



Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We have also established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us where you have opted to do so or where you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Crowe Financial Planning UK Limited for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or by contacting us at any time.

We will need to maintain a restricted record of Contact and Identity Data where you have opted out of receiving marketing and this is to prevent any future marketing being carried out and, unless otherwise informed, no other processing shall be carried out in relation to this information.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy at the end of this privacy notice.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit.
- 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.

6. International transfers

We may use external third parties who are based outside the European Economic Area (**EEA**) and their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Regime. For further details, see <https://www.ico.org.uk/>.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your personal data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely. The exception to this is for data used to identify you which will be deleted five years after our relationship ends.

As a financial service firm, we are regulated by the Financial Conduct Authority (the FCA) who imposes certain record-keeping rules which we must adhere to.

9. Your legal rights

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Where you object to direct marketing we shall maintain a restricted record of Contact and Identity Data recording that you have opted out of receiving marketing and we can ensure that no future marketing is carried out. Unless otherwise informed no other processing shall be

carried out in relation to this restricted record. We will need to maintain where you have opted out of receiving marketing and this is to prevent any future marketing being carried out and, unless otherwise informed, no other processing shall be carried out in relation to this information.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

Lawful Bliss

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

External Third Parties

- Service providers acting as processors based in the United Kingdom who provide IT and system administration services, customer data collection forms, payment processing services, data shredding services.
- Professional advisers/bodies acting as processors or joint controllers including lawyers, bankers, auditors, credit reference agencies, marketing companies, accountants, HR companies, bookkeepers, compliance specialists, insurers and anti-money laundering and fraud register providers based in the United Kingdom who provide consultancy and other services.
- Financial platform and product providers for investments and insurance
- HM Revenue & Customs, regulators and other authorities (including the Financial Conduct Authority, the Financial Ombudsman Service) based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Data protection authorities, the police and other crime prevention and detection agencies if required.
- Marketing automation platforms, acting as a processor.
- Survey development and distribution platforms, acting as a processor.
- Social media platforms acting as processor or joint controllers

COOKIES POLICY

Information about our use of cookies

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. By continuing to browse the site, you are agreeing to our use of cookies.

We use the following cookies:

Strictly necessary cookies - cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookies - allows us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.



Functionality cookies - used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Cookies can expire at the end of a browser session or they can be stored for longer. Your browser settings can also enable you to clear cookies on exit from specified websites.