

Client Privacy Notice

What is the lawful basis for HHFM processing and holding client data?	(1) Fulfilment of Contract (2) Legal Obligation (3) Legitimate Interest
How long do we hold client data?	HHFM will collect and retain relevant information indefinitely to satisfy FCA's regulatory compliance requirements for providing advice, ensuring the ongoing suitability of our recommendations and anti-money laundering verification checks. The lawful basis for processing your data is that we have a legitimate interest and legal obligation to do so. The information below is held on the basis that you, our client (data subject), understand that we need to process and hold this information in order for us to comply with our agreed services as outlined in our Terms of Business which forms the basis of our contract with you. Potential new clients data will be held for 6 months. It is at this point that it will be securely removed from our systems and premises unless you have signed our Terms of Business. The data controllers at Heron House are Saran Allott Davey and Cassy Lewis.

What data do we collect	How do we use it and what for?	Where does the data come from?	Who do you share it with?	Where is it kept?
Clients' personal and health information and family links	To allow us to fully understand your goals and financial situation so we can provide suitable advice. To manage and administer the relationship between us.	Clients provide us with this information or it is taken from product providers and other professional contacts e.g. Accountants.	<ul style="list-style-type: none"> • Any HHFM Staff who are appointed to complete work on your behalf. • Product Providers in the form of written and online quotations and application forms for example. • Professional Contacts such as Solicitors and Accountants where we have our client's explicit permission in the form of our third party authorisation form. • Electronic Identity Verification Software to complete identity and address verification checks to meet Anti Money Laundering Regulations. 	<ul style="list-style-type: none"> • Physical file • Document Management System • Client Database • Financial Planning Software • Product Providers Database • Email Software • HHFM Server • Backup Tapes • Archive • File Room • Safe • Temporarily on a senior staff members password protected mobile device or email.
Dependents' personal details	This information is used to build factfinds to allow us to have a full personal and financial understanding of your current circumstances so we can provide suitable advice. This information also helps inter-generational planning.	Clients provide us with this information or it is taken from product providers and other professional contacts e.g. Accountants.		
Clients' financial information	To be able to provide financial advice based on your current financial circumstances.	Clients provide us with this information.		
Contact details	To provide you with information about our services, provide updates about your financial planning and to respond to your queries.	Clients provide us with this information, Internet, Literature, Professional Contacts and Regulatory Boards.		
Identity Documentation	To meet Anti Money Laundering Regulations.	Clients, Electronic Identity Verification Software.		

You, as the client, have a number of rights under GDPR. You can view these in more detail on the Information Commissioner Office website. (www.ico.org.uk). In order to exercise one of these rights you can contact us at Heron House Financial Management Ltd, Heron House, 1 Bryngwyn Road, Newport, South Wales, NP20 4JS - 01633 258200 - mail@hhfm.co.uk. A response to this request will be sent as soon as possible but will be completed within 28 days.

Visitors to our office should note that we have CCTV in operation outside the building for security purposes. This information is held securely for a 1 week period and in the event of any criminal activity, your details may be passed to the police or insurance provider as our legal obligation.