
PRIVACY NOTICE

BACKGROUND:

Paul Milbank understands that your privacy is important to you and that your personal information (personal data) is used fairly and responsibly. I respect and value the privacy of all of my clients and will only collect, process and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law.

Paul Milbank has implemented systems and controls to ensure your rights and freedoms are protected and undertakes to meet my obligations under Data Protection Legislation, i.e. the Data Protection Act 2018 (DPA 2018), the UK General Data Protection Regulation (UK GDPR), and the Privacy and Electronic Communications Regulations (PERC).

1. Information About Me

Paul Milbank

ICO Registration number ZA458954

Sole Trader

Email address: milbankp@gmail.com.

Telephone number: 01243 869349

Postal Address: 8 Lethaby Road, Bognor Regis, West Sussex PO21 5EJ.

2. What Does This Notice Cover?

This Privacy Notice explains how I use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Personal Data Is Collected?

I will collect the following personal data, dependent upon the financial service required: Name, address, contact telephone numbers, email address, bank statements, passport, council tax and utility bills, driving licence, benefit statements, shotgun licence, payslips, criminal record information, existing pension information, life cover information, investment information, details of assets and liabilities, health information – life policies and long term care information - annual expenditure and any other existing relevant policy details, family situation & dependants.

Different variations of personal data are required for each financial product so I may not be required to collect all of the data listed above for all products or services.

4. How Your Personal Data is Collected

You directly provide me with the personal data collected by the following methods: original physical copies, scanned certified email copies, scanned certified postal copies, of relevant documents.

5. Who Will Process Your Personal Data?

Your personal data will initially be processed by Nexus, who are the Financial Advisers I work with in a liaison role. Access to your personal data is permitted only for those Nexus Advisers & staff who require it to fulfil their responsibilities on your behalf. Your personal data will be further processed by On-Line Partnership Group Limited on behalf of its subsidiary company The Whitechurch Network Limited who acts as Nexus' Principal for regulatory purposes. All parties will process your personal data in accordance with this Privacy Notice and the requirements of Data Protection Legislation. All parties are subject to information security training to enforce and communicate best practice when handling information.

6. What Happens If I Want To Process Your Personal Data For Other Reasons?

Though there are some legal exceptions, if I wish to process your personal data for any other unrelated purpose than those I have informed you about I will notify you.

7. What Are The Consequences If You Do Not Provide Your Personal Data?

Your personal data is essential to enable me to take steps (at your request) prior to entering into a contract or to perform a contract to which you are a party. Without this information Nexus will not be able to proceed to provide any financial service. Processing will only occur whereby it is necessary to protect the vital interests of a client

8. What Makes The Processing Lawful?

The lawful basis for the processing of your personal data as per Article 6(1) of the UK GDPR is:

- necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract
- for compliance with a legal obligation to which I am subject
- for the performance of a task carried out in the public interest
- for the purposes of the legitimate interests pursued by me
- you have given clear consent to process your personal data for a specific purpose.

9. Keeping Your Personal Data Up To Date

I will record your information exactly as you provide it. You may ask me to update it at any time and I will action your request promptly and notify relevant third parties of any changes.

10. What About Sensitive Personal Data?

Unless I am processing because it is necessary for reasons of substantial public interest, I will only process sensitive personal data, such as data concerning health, racial or ethnic

origin, or sexual orientation, with your explicit and informed consent for specific purposes. In such cases you will be asked to sign a separate consent form from Nexus to evidence this and that you understand the purpose(s) of the processing of such data. Your consent may be withdrawn at any time.

11. How Will I Further Use Your Personal Data or my Legitimate Interests)?

- To contact you to ensure that my records of your personal information are correct and up to date;
- to respond to questions or complaints you may have about my services;
- to update you with changes in my terms;
- to review, improve and develop services I offer or to handle complaints;
- to pursue debts or unpaid fees;
- to evidence company practices;
- to evidence the standards and processes carried out conform to ethical standards and expectations;
- for direct marketing activities;
- to protect the business from risks which might be introduced by an individual.

You have the right to object to processing for these purposes and I shall cease unless I can show or I have compelling legitimate grounds to continue.

12. Processing When Performing a Task Carried Out In The Public Interest?

I will use your personal data to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent to ensure this function is not prejudiced. Part of this processing involves verifying your identity using third parties such as GB Group Plc or Creditsafe Business Solutions Ltd.

13. What Personal Data Is Required?

I only collect data that is necessary to carry out the purposes listed above. This includes data you supply and data received from reference agencies. Where practical and lawful I will inform you about any of your personal data I receive from third parties that you may be unaware of.

14. How Secure Will Your Data Be?

I will ensure that your data I hold is only accessible to authorised people and will remain confidential at all times. Appropriate security measures are in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information.

If another organisation is contracted to provide me with services or a service on my behalf to process your personal information, I will make sure they give reassurances regarding appropriate security measures in place and only process your data in the way I have authorised them to. These organisations won't be entitled to use your personal data for their own purposes. If necessary, I will check them to make sure they meet the security requirements set.

15. **Will Your Data Be Shared With Anyone Else?**

I may share your data with:

- Organisations that need your data because I am required to provide it by law (e.g. The FCA, ombudsman services, HMRC, etc...)
- Law enforcement agencies, courts or other public authorities if I have to, or are authorised to, by law.
- Where I go through a business transaction, such as a merger or being acquired by another company, your data will, in most instances, be part of the assets transferred.

16. **Automated Decision Making Process**

I do not use automated processes when making decisions.

17. **Transferring Your Personal Data Outside the UK/European Union**

I do not usually transfer any of your personal data outside of the UK or EU.

18. **What About Direct Marketing?**

I may use your personal data provided now and in the future to carry out direct marketing activities as these are legitimate interests pursued by me. You can choose which method you'd prefer me to use to contact you (by email, telephone, or post) and you have the right to object at any time to the use of your personal data for this purpose and I will cease marketing activity. Contact me (see below) to tell me about your preferences.

19. **Telephone Call Recording**

In line with The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 I may record incoming or outgoing telephone conversations for the following purposes:

- Establishing facts and evidence for business transactions
- Ensuring compliance with regulatory or self-regulatory practices
- Ascertaining and demonstrating that standards are being met
- Preventing or detecting crime
- Investigating or detecting the unauthorised use of that or any other telecommunication system
- Safeguarding the effective operation of the telecommunications system.

20. **How Long Will Your Personal Data Be Kept For?**

The Financial Conduct Authority lays down rules relating to how long your personal data should be held for and I will keep your data to meet these requirements. I will not keep your personal data for longer than is necessary in light of the reason(s) for which it was first collected. The following factors will be used to determine how long your personal data is kept:

- Business requirements
- Legal requirements
- Regulatory requirements

21. **Requesting A Copy Of Your Personal Data**

You may at any time ask for a copy of the personal data I hold about you – it is your legal right. This is known as a “subject access request”. I prefer if all subject access requests are made in writing (including by email). There is not normally any charge for a subject access request. I will provide you with a copy of any non-exempt personal data within one month unless I ask you for an extension of time. To protect your personal data, I will ask you to verify your identity before I release any data. I may refuse your request if I am unable to confirm your identity. Please contact me (see below) if you wish to request a copy of your data.

22. **Important Rights**

You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of my legitimate interests or in the performance of a task carried out in the public interest. I will no longer process your personal data unless I can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims.

You have the right to object at any time to processing your personal data for marketing activities. In such a case I must stop processing for this purpose.

23. **What Are Your Other Legal Rights**

In addition to the rights above you have the additional following rights:

- Where you have given consent, you have the right to withdraw previous consent to processing your personal data at any time;
- You have the right to request from me access to and rectification or erasure of personal data or restriction of processing concerning your data;
- You have the right to receive data you have provided to me in a structured, commonly used and machine-readable format;
- You have the right to object to processing of personal data;
- You have the right to lodge a complaint with the regulator (see below).

To exercise any of these rights please contact me (see below).

24. **How To Contact Me About Data Protection**

Your trust is important to me. That is why you can contact me about any data protection or marketing issues.

- By writing to:
Postal Address: 8 Lethaby Road, Bognor Regis, West Sussex PO21 5EJ
- By Emailing: milbankp@gmail.com
- By telephoning: 01243 869349

25. **How to make a complaint to the regulator?**

By writing to:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

By telephoning: 0303 123 1113.

By emailing: casework@ico.org.uk

By using their website:

<https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

26. **Changes To This Privacy Notice**

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if my business practices change in a way that affects personal data protection.