PRIVACY POLICY

How we use your information

This privacy notice tells you what to expect when Sturdy Edwards (Financial Services) Ltd collects personal information. It applies to information we collect about you. To enable us to provide the services we have agreed and for other related purposes – including updating and enhancing customer records, analysis for management purposes and statutory returns, crime prevention and legal & regulatory compliance – we may obtain, use, process and disclose personal data about you.

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site www.sturdyedwards.co.uk.
- Information that you provide to us by telephone, e-mail or face to face.
- If you contact us, we may keep a copy of that correspondence.

Visitors to our websites

When someone visits www.sturdyedwards.co.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by Sturdy Edwards (Financial Services) Ltd

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited.

Security and performance

Web Design Ltd uses a third-party service to help maintain the security and performance of the ICO website. To deliver this service it processes the IP addresses of visitors to our website(s).

People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. We usually have to disclose details of the complaint to our Professional Indemnity Insurance Broker and Insurer. We may be required to provide a copy of our file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint case. We are required to disclose to the Financial Conduct Authority (FCA) high level analytics concerning the number and nature of complaints received. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 7 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Bank details – to process [salary/commission/bonus] payments

We may hold information relating to your bank details, salary, commission or bonus payments etc in order to process an application for a financial product.

Use of data processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. Our Data processors / Third parties that we use include:

- General Insurance arrangements: Sturdy Edwards (Insurance Brokers) Ltd
- Banking arrangements: Lloyds
- Legal opinion where required: DMH Stallard
- Regulatory and Compliance opinion where required: Millen Compliance Ltd
- Back Office Systems: Durell Software
- Research Software Tools: Trigold/ IRESS
- Durell Procloud
- Fleet Finance (Commercial Finance Broker)

Your rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you. From 25 May 2018 the General Data Protection Regulations (GDPR) come into force.

Access to personal information (Portability)

Data Subjects may submit a Subject Access Request - in order to obtain a copy of the personal data that we hold about them in a structured and portable manner. All SAR requests should be sent to:

Paul Clarke

Sturdy Edwards (Financial Services) Ltd

193-193A London Road, East Grinstead, West Sussex RH19 1HA

Tel: 01342 313733

e-mail: paul@sturdy-edwards.co.uk

Confirmation of whether, and where, the controller is processing their personal data

Sturdy Edwards (Financial Services Ltd) is the Data Controller and a Processor. Sturdy Edwards (Financial Services) Ltd undertakes data processing within the EEA.

Right of Data Subjects to erasure (Right to be forgotten)

Data Subjects may notify Sturdy Edwards (Financial Services) Ltd if they wish to exercise their right to erasure. Such a withdrawal of Consent does not affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact. Sturdy Edwards (Financial Services) Ltd may retain a copy of any personal data and be retained by the Controller if the processing is necessary for the establishment, exercise or defence of legal claims.

Right of rectification

Sturdy Edwards (Financial Services) Ltd will seek to ensure that inaccurate or incomplete data will be rectified. Data Subjects have the right of rectification.

Right to object to processing for the purposes of Direct Marketing

Data Subjects may notify the Firm if they wish to exercise their right to be removed from any Direct Marketing activities. Sturdy Edwards (Financial Services) Ltd may still contact the Data Subject in order to fulfil any contractual obligations concerning the policies and services provided.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

Sharing Information with Third Parties

We may share your information with third party service providers such as insurance providers, compliance, and other agents relevant to the business activity.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 27/11/2024

How to contact us

If you want to request information about our Privacy Policy, you can email us or write to:

Sturdy Edwards (Financial Services) Ltd

193-193A London Road, East Grinstead, West Sussex RH19 1HA

CONSENT for Sturdy Edwards (Financial Services) Ltd to hold, store and process your personal data

Information supplied may be stored on computer or paper records and may be used for Regulatory, record-keeping, contact and marketing purposes by Sturdy Edwards (Financial Services) Ltd. Details may be passed to our Regulatory Authorities & Auditors for the purpose of compliance. We will NOT pass on your data to third parties for any marketing purposes.

Do you consent to this?	YES		Do you consent to this?	YES	

Client Name		Client Name	
Client Signature		Client Signature	
Date		Date	

CONSENT for Sturdy Edwards (Financial Services) Ltd to contact you

We wish to gain your agreement, so we may contact you at any point in the future (including by telephone & email) for ongoing services & marketing purposes – for example, with valuations, details of products, services or promotions we think you might be interested in.

Do you consent to this?	YES		Do you consent to this?	YES	

Client Name		Client Name	
Client Signature		Client Signature	
Date		Date	

(*N.B. If you do not wish for your data to be stored on computer records, we may be unable to act for you.)

<u>WITHDRAWAL OF CONSENT</u>

If at any time you wish us – or any company associated with us – to cease obtaining, using, processing and disclosing personal data about you (including contacting you for marketing purposes), please contact us to withdraw your consent:

in writing to Paul Clarke, Sturdy Edwards (Financial Services) Ltd, 193-193A London Road, East Grinstead, West Sussex RH19 1HA

or by phone to Paul Clarke on 01342 313733 or by email to paul@sturdy-edwards.co.uk.

Subject to certain exceptions, you are entitled to have access to your personal data held by us.

sturdy EDWARDS (Financial Services) Limited