

# Customer Privacy Notice

## Grayside Limited

1<sup>st</sup> Floor, 55 High Street, Epsom, Surrey, KT19 8DH

Grayside Limited is authorised and regulated by the Financial Conduct Authority.

### Why are we asking you to read this document?

During the course of dealing with us 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 Information**). We would like to **explain to you what we will need to do with Your Information**, and the various rights you have in relation to **Your Information**.

### What do we mean by “Your Information”?

Your Information means any information describing or relating to you. Your Information may identify you directly, for example your name, address, date of birth, National Insurance number and the like. Your Information may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with financial advice, assistance in relation to your mortgage, and/or insurance requirements Your Information may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details (including email and telephone) and property address(es)
- Copies of passport, driving licence and/or other documents that are necessary to verify your identity
- Contact details for your Professional contacts (such as solicitor and accountants) where applicable
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, national insurance number, tax information, loans and credit commitments, personal credit history, sources of income and expenditure
- Family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Details of driving and other criminal convictions where relevant to arranging an insurance contract
- Any pre-existing savings, investments, pensions, mortgage and/or insurance products and the terms and conditions relating to these

### The basis upon which our Firm will deal with Your Information

When we speak with you about your investment, mortgage and/or insurance requirements we do so on the basis that a **contract for the supply of services** is in place between us. In order to perform that contract, and to arrange the products you require, we have the right to use Your Information for the purposes we set out below.

Alternatively, either in the course of initial discussions with you **or** when the contract between us has come to an end for whatever reason, we have the right to use Your Information provided it is in our **legitimate business interest to do so and your rights are not affected**. For example, we may need to respond to requests from product providers, mortgage lenders or insurance companies and our Firm may make contact with you to seek feedback on the service you received.

On occasion, we will use Your Information to enable us to meet compliance with **legal or regulatory obligation to which we might be subject**. If this were to arise we would be processing Your Information in order to meet a legal, compliance or other regulatory obligation to which we are subject.

This includes sharing Your Information with, or complying with, all applicable regulators such as the Financial Conduct Authority (FCA) and the Information Commissioners Office (ICO).

## How we process Special Data and Criminal Disclosures

Where you ask us to assist you with your insurance needs, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your health and medical history (**Your Special Data**). We will record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 16 it is also very likely that we will record information that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

Your Special Data and any Criminal Disclosures will be used by us in the same way as Your Information generally, as set out in this Customer Privacy Notice.

When we process your Special Data and any Criminal Disclosures we do so on the basis that it is in the substantial public interest to be able to provide vital insurance products and as permitted by UK data protection related laws and regulations from time to time. Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

When we make reference in the remainder of this document to Your Information this includes Your Special Data and Criminal Disclosures.

## How do we collect Your Information?

We will collect and record Your Information from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to investments, mortgages and insurance. You will provide information to us verbally and in writing, including email and any on-line facilities that may be made available to you.

We may also obtain some information from third parties, for example, credit checks, information from your employer, information from existing product providers, lenders and insurance companies, and searches of information in the public domain such as the voters roll. Where we use technology solutions to assist in the collection of Your Information, such as software that is able to verify your identity on-line or to access your credit status, you are providing your consent for us or our nominated processor to access your information in this manner.

## What happens to Your Information when it is disclosed to us?

In the course of handling Your Information we will:

- Record and store Your Information in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, cloud facilities*) and it will be accessed by employees and consultants within, or contractors engaged, by our Firm as necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit Your Information to product providers, mortgage lenders and/or insurance companies, both in paper form and on-line via product provider/mortgage lender/insurance company systems, in order to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that mortgage lenders and insurance providers may raise
- Input Your Information, along with full details of the investment, mortgage and/or insurance, discussed with you or which you have taken out, if applicable to our computer systems
- Use Your Information for the purposes of responding to any queries you may have in relation to any investment, mortgage product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware
- Use, and where appropriate transmit, Your Information to respond to any request from the Financial Conduct Authority (FCA), the Financial Ombudsman Service (FOS), HMRC, the Office of the Information Commissioner (ICO) or any other regulatory, law enforcement or governmental body
- Use Your Information for the purposes of carrying out identity, anti-fraud and/or anti-money laundering checks in order to ensure that we meet our legal and regulatory obligations, and for the benefit of individuals to support identity verification and support the detection and prevention of fraud and money-laundering. In order to carry

out these checks we may utilise the services of a Credit Reference Agency. We currently use TransUnion (formerly Callcredit) for this service, and a link to their Credit Reference Agency Information Notice (CRAIN) can be found at the following address: <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>

## Sharing and transferring Your Information

From time to time Your Information may be shared with or transferred to:

- Investment product providers, mortgage lenders and insurance companies
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified, such third parties will include but may not be limited to, product specialists, estate agents, providers of legal services such as conveyancing, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances)
- Contractors or suppliers who we may engage to assist us with any customer feedback exercises
- Our professional indemnity insurers, brokers, claims handlers and legal advisers and another person who may provide professional services in connection with the handling of a complaint, litigation or investigation
- Any person we may engage in connection with any investigation to detect, prevent or investigate financial crime, including those that may be carried out by or in conjunction with investment product providers, mortgage lenders, insurance companies and regulators
- Contractors or suppliers who we may engage with to assist us with discharging our compliance obligations arising out of FCA regulation
- Third party administrators, packagers or other associated companies for the purposes of arranging or assisting to arrange your investment, mortgage and/or insurance requirements
- Credit reference agencies, for the purpose of carrying out identity, anti-fraud and anti-money laundering checks and/or to promote responsible lending and helping to prevent over indebtedness
- Purchasers / investors: We may share your information with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets or who are stakeholders or investors in our business. Alternatively, we may seek to acquire other business 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 notice.

In each case for the purposes set out in this customer privacy notice, i.e. to progress your investment, mortgage and/or insurance enquiry and to provide you with our professional services.

**Please note that this sharing of Your Information does not entitle such third parties to send you marketing or promotional messages: it is shared for the purpose of ensuring we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.**

Normally, we do not envisage that the performance by us of our service will involve Your Information being transferred outside of the European Economic Area. However, exceptionally data may be transferred outside the EEA (for example to an investment company in the Isle of Man), but only where we are satisfied that the EU has determined that the country has an adequate level of data protection and has granted it with formal "Adequacy Status".

## Security and retention of Your Information

Your privacy is important to us and we will keep Your Information secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed or damaged.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us.

Your information will be retained by us either electronically and/or in paper format for a minimum of six years. We have responsibility to ensure the suitability of advice or recommendations provided to you, and to respond to and investigate any complaint you may make. The rules and regulations of the FCA do not generally provide for any automatic time bar after which you would be prevented from making a complaint to us (the exception being payment protection insurance). We will therefore keep a record of products and services that have been provided to you for as long as we consider reasonably necessary to be able to discharge our obligations to you.

## How we will contact you about other products and services

We may from time to time process your personal data to let you know about similar products and services that may be of interest to you and to send you our occasional electronic newsletter. This is because we value your custom and

we pride ourselves in offering professional and tailored advice which meets your specific needs for financial advice and insurance. This includes keeping you informed on the latest investment, mortgage and insurance industry information and details of any offers or promotions relating to the financial advice, mortgage and insurance services we provide to you.

Our lawful basis for processing your personal data in this way is as is necessary to pursue the legitimate interests of our business, unless we have otherwise obtained your consent to do so. We may contact you by post, telephone or e-mail. You will be given the option to stop receiving any communications from us in this regard at any time however please note that this will not affect us contacting you about the servicing of products that you have specifically requested from us.

## Accessing our website and cookies

When you visit one of our websites we may collect information from you, such as your email address, IP address and other online identifiers. Full details of our Cookie Policy are disclosed on our websites and you should visit [www.grayside.co.uk](http://www.grayside.co.uk) or [www.graysideinsurance.co.uk](http://www.graysideinsurance.co.uk) and click on "Cookie Policy" for more information.

## Your rights in relation to Your Information

You can:

- Request copies of Your Information that is under our control
- Ask us to further explain how we use Your Information
- Ask us to correct, delete or require us to restrict or stop using Your Information (details as to the extent to which we can do this will be provided at the time of any such request)
- Ask us to send an electronic copy of Your Information to another organisation should you wish
- Change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

## How to make contact with our Firm in relation to the use of Your Information

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

Phil Hancock, Director & Data Protection Officer,  
Grayside Limited, 1<sup>st</sup> Floor, 55 High Street, Epsom, Surrey, KT19 8DH  
Email: [phil@grayside.co.uk](mailto:phil@grayside.co.uk)  
Telephone: 01372 726162

If we feel we have a legal right not to deal with your request, or to action it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Information, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Information or Your Special Data/Criminal Disclosures you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Grayside Customer Privacy Notice (v3) Oct 2021**