

PRIVACY NOTICE



1. General

- 1.1 Grove Pension Solutions Ltd (“we”, “us” or “Grove”) take the privacy of your information very seriously. This Privacy Notice is designed to tell you about our practices regarding the collection, use and disclosure of personal information which may be collected in person from you, obtained via our websites or collected through other means such as by an online form, email, or telephone communication.
- 1.2 This notice applies to personal information provided by our clients, customers and suppliers whose data we process. In this notice “you” refers to any individual whose personal data we hold or process.
- 1.3 In general, our services relate to the provision of financial services to individual clients and we do not process personal data on a large scale, but we will hold and process personal data in order to supply our services and this policy explains how we do so.
- 1.4 This notice is governed by the EU General Data Protection Regulation (the “GDPR”), the Data Protection Act 2018 and any other applicable data or privacy legislation.

2. Legal Basis on which we process personal data

- 2.1 Personal data we hold about you will be processed either because:
 - 2.1.1 you have provided your consent to Grove to process the personal data; or
 - 2.1.2 the processing is necessary in order for us to comply with our obligations under a contract between you and us, specifically for the provision of our services; or
 - 2.1.3 the processing is necessary in pursuit of a “legitimate interest”, a legitimate interest in this context means a valid interest we have, or a third party has, in processing your personal data which is not overridden by your interests in data privacy and security; or
 - 2.1.4 for certain ‘special categories’ of sensitive personal data including data relating to health which we may process from time to time we will process this data on the basis of your consent.

3. Personal data we collect

- 3.1 Below we have set out the categories of data we collect, the legal basis we rely on to process the data and how we process the data:
 - 3.1.1 we will hold contact information for our clients and suppliers such as names, email addresses, phone numbers, addresses (“Contact Information”);
 - 3.1.2 we hold some information which we require in order to verify your identity as part of our ‘know your client’ processes (“KYC Information”);
 - 3.1.3 We will hold general information about our clients, their spouses or partners and dependants including their age and gender (“Background Information”);
 - 3.1.4 we will also hold information about our client’s income and expenses, finances, bank facilities, employment history, salary and employment benefits, pensions and investments (“Financial Information”);



- 3.1.5 we may hold information about your health to the extent that this is relevant to our services (“Health Information”);
 - 3.1.6 a record of any correspondence or communication between you and us, including recordings of phone calls (“Communication Information”);
 - 3.1.7 we may hold certain information about you in order to provide information about our services this may include names, email addresses, phone numbers, addresses, and other information (“Marketing Information”).
- 3.2 We process Contact Information, Know Your Client Information, Financial Information, Background Information and Communication Information on the basis of the performance of our contract with our client and on the basis of our legitimate interest in providing our services to our clients.
- 3.3 We process Marketing Information on the basis of our legitimate interests in communicating with interested individuals about our services or on the basis that you have consented to receive the information.
- 3.4 We process Health Information on the basis of explicit consent only, which we will obtain under a separate consent form.
- 3.5 We will collect information either from you directly or from a third party (for instance an introducer). If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.
- 3.6 You do not have to supply any personal information to us, but in practice we may be unable to provide our services to you without personal data (for instance we will need contact information in order to communicate with you). You may withdraw our authority to process your personal data (or request that we restrict our processing) at any time but there are circumstances in which we may need to continue to process personal data (please see below).

4. Data Retention

- 4.1 Our current data retention policy is to delete or destroy (to the extent we are able to) personal data in accordance with the following retention periods:

Advice records

If we are providing advisory services to you in accordance with our obligations under applicable FCA regulations we will hold all of the relevant records indefinitely.

Other client records (relating to an agreement or proposed agreement for us to provide services to you)

Up to 30 years from the end of the contract with you or your adviser, or from the date we last provided services to you or from the date we receive information from you relating to proposed services in the event of a complaint.

Marketing and business development records (where we have not provided services to you and you have not provided information to us)

Up to 3 years from the last date on which you have interacted with us.



- 4.2 For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law or regulations, the required retention period for any personal data will be deemed to be 5 years from the date of receipt by us of that data or the date you cease to be a client.
- 4.3 The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).
- 4.4 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.
- 4.5 If you wish to request that data we hold about you is amended or deleted, please refer to clause 8 below, which explains your privacy rights.

5. **Sharing your information**

- 5.1 We do not disclose any information you provide to any third parties other than as follows:
- 5.1.1 We may be required to disclose certain data to our regulators;
 - 5.1.2 If you have been introduced by a financial adviser or other introducer we may share information with that introducer;
 - 5.1.3 We may share information with Creditsafe or other identity verification reference agencies in order to verify your identity and obtain 'know your client' information;
 - 5.1.4 We may share information with certain financial services providers or intermediaries in order to find suitable financial products for you;
 - 5.1.5 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);
 - 5.1.6 in order to enforce any terms and conditions or agreements for our services that may apply;
 - 5.1.7 If we are sub-contracting services to a third party we may provide information to that third party in order to provide the relevant services;
 - 5.1.8 we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;
 - 5.1.9 to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 5.2 Other than as set out above, we shall not disclose any of your personal information unless you give us permission to do so. If we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.



6. Security

- 6.1 We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):
- 6.1.1 protecting our servers with software firewalls;
 - 6.1.2 locating our data processing storage facilities in secure locations;
 - 6.1.3 encrypting all data stored on our server with an industry standard encryption method that encrypts the data between your computer and our server so that in the event of your network being insecure no data is passed in a format that could easily be deciphered;
 - 6.1.4 when necessary, disposing of or deleting your data so it is done so securely;
 - 6.1.5 regularly backing up and encrypting all data we hold.
- 6.2 We will ensure that our employees are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and data security obligations.
- 6.3 This notice and our procedures for handling personal data will be reviewed as necessary.

7. Cookies and IP Address

- 7.1 A cookie is a piece of data stored locally on your computer and contains information about your activities on the Internet. The information in a cookie does not contain any personally identifiable information you submit to our website.
- 7.2 On our website, we use cookies to track users' progress, allowing us to make improvements based on usage data. A cookie helps you get the best out of the website and helps us to provide you with a more customised service.
- 7.3 Once you close your browser, our access to the cookie terminates. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. To change your browser settings you should go to your advanced preferences.
- 7.4 We are required to obtain your consent to use cookies. We will obtain this consent with a toolbar which appears when you first visit the website.
- 7.5 If you choose not to accept the cookies, this will not affect your access to the majority of information available on our website. However, certain online services may not be available.
- 7.6 An Internet Protocol (IP) address is a number assigned to your computer by your Internet Service Provider (ISP), so you can access the Internet. We may use your IP address to diagnose problems with our server, report aggregate information, and determine the fastest route for your computer to use in connecting to our website, and to administer and improve the website.



8. Your privacy rights

- 8.1 With respect to your personal data, you have the rights set out in the GDPR, including the right to:
- 8.1.1 request that your personal data will not be processed;
 - 8.1.2 ask for a copy of any personal data that we have about you;
 - 8.1.3 request that your personal data is deleted;
 - 8.1.4 request a correction of any errors in or update of the personal data that we have about you;
 - 8.1.5 request that your personal data will not be used to contact you for direct marketing purposes;
 - 8.1.6 request that your personal data will not be used for profiling purposes;
 - 8.1.7 request that your personal data will not be used to contact you at all;
 - 8.1.8 request that your personal data be transferred or exported to another organisation, or deleted from our records; or
 - 8.1.9 at any time, withdraw any permission you have given us to process your personal data
- 8.2 All requests or notifications in respect of your above rights may be sent to us in writing at the contact details listed below.
- 8.3 We will endeavour to comply with such requests without undue delay but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

9. Data Breaches

- 9.1 If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO) and/or our data protection manager.
- 9.2 If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

10. Transferring your information outside Europe

- 10.1 We will not transfer your personal data in a systematic way outside of the EEA but there may be circumstances in which certain personal information is transferred outside of the EEA, in particular:
- 10.1.1 If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with our services;
 - 10.1.2 We may communicate with individuals or organisations outside of the services in providing goods and services, those communications may include personal information (such as contact information) for example you may be outside of the EEA when we communicate with you;



10.1.3 From time to time your information may be stored in devices which are used by our staff outside of the EEA (but staff will be subject to our cyber-security policies).

10.2 If we transfer your information outside of the EEA, and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice.

10.3 By submitting your personal information to us you agree to the transfer, storing or processing of your information outside the EEA in the manner described above.

11. Notification of changes to the contents of this notice

We will post details of any changes to our policy on the Site to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

12. Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so by contacting Kate Jones using the details below:

Address: Grove Pension Solutions Ltd, New Grove House, Murray Road, Orpington, Kent, BR5 3QY

Tel: 01959 534 082

Email: kate@groveps.co.uk

13. Complaints

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner's Office by visiting <http://www.ico.org.uk/> for further assistance.

