Brunswick Investment Management Ltd
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Privacy Notice

This privacy notice explains how Brunswick Investment Management Ltd use any personal information we collect about you.

What information do we collect about you?

We may collect a small amount of personal information about you such as name and contact details, if you contact us directly.

We record all calls to comply with regulatory obligations.

Otherwise, we will receive personal data about you through the course of providing investment services to our professional client i.e. your financial adviser.

This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services. If such data is made available to us we will only process it if your financial adviser has confirmed your consent to do so.

If you have requested a service from us we will not be able to provide it without certain information.

Information about connected individuals

Your financial adviser may provide us with personal information about your close family members and dependants to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. Your financial adviser will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is to comply with our obligations arising from the contract entered into between you and your financial adviser and between your financial adviser and us. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data, we would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required your financial adviser will obtain your explicit consent to collect and process this information and to pass this information onto us.

How will we use the information about you?

We collect information about you to provide you with the services for which your financial adviser engages us.

Who might we share your information with?

To deliver our services to you effectively we may disclose your details to third parties such as those that we engage for professional compliance, legal services, relevant regulatory authorities, as well as product and platform providers that your financial adviser uses to hold financial products for you.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be disclosed to a third party we will use appropriate security measures to protect your personal data in transit. Any outgoing emails will be fully encrypted whilst in transit to ensure your data remains secure.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we will rely on the third-party regulations which permit a firm to rely on another firm to apply all the required measures. Your financial adviser will hold the necessary verification documents and we may request your financial adviser to provide copies of the documents, if required.

How long do we keep hold of your information?

During our service contract with your financial adviser we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our service contract.

We are also subject to regulatory requirements to retain your data for a specified minimum period, not less than five years or termination or expiry of our service contract with your adviser.

This is a **minimum** period, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than five years after our service contract with your professional adviser has ended.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask your financial adviser to inform us to correct or remove any information that you think is incorrect.

Marketing

The professional adviser firm may send you information about our products and services which may be of interest to you, however we will not contact you directly.

We will not share your information for marketing purposes with other companies.

You have a right at any time to stop the professional adviser firm from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact them by email or post.

What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

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

0303 123 1113 (local rate)

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 24th April 2018. We reserve the right to amend this Notice at any time.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at team@brunswickim.com

Or write to us at Brunswick Investment Management Ltd, Suite 7, Wensum Mount Business Centre, Low Road, Hellesdon, Norwich, NR6 5AQ