

# DATA PROTECTION NOTICE

We take your privacy very seriously and ask that you read this notice carefully as it contains important information about who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event that you have a complaint.

## WHO WE ARE

Keystone Financial Ltd collects, uses and is responsible for the personal data we gather from you. We are required to comply with data protection regulation and we are responsible as the data controller of that personal data for the purposes of the law.

We provide financial planning, financial advice and intermediary product arrangement services to individuals and businesses.

## PERSONAL DATA WE COLLECT FROM YOU

In the course of providing our service to you we may collect the following personal data when you provide it to us:

Contact information	This includes any information that can be used to contact a person such as title, forename, surname, personal telephone number and email address. This may also include work contact information such as business name, work telephone number and email address.
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## HOW WE USE YOUR PERSONAL DATA

The below table sets out how we use your personal data, the the lawful bases upon which we collect and use your personal data who we routinely share your personal data with:

Reason for Data Processing	Lawful Basis for Data Processing
To provide you with details of products and services from ourselves and third parties that may be of interest to you in accordance with your preferences.	Consent

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

## MARKETING

We may use personal data that we hold about you to help us identify, tailor and provide you with details of products and services from us or third parties that may be of interest to you in accordance with your preferences.

You can opt-out of receiving marketing material, or you can change your marketing preferences at any time by emailing your instructions to: [compliance@keystoneltd.co.uk](mailto:compliance@keystoneltd.co.uk) You can also opt-out of marketing by following the instructions at the bottom of any marketing email.

## WHEN INFORMATION MUST BE PROVIDED BY YOU

We will tell you if providing some personal data is optional and ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with our services.

## HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will retain personal information we collect when we have an ongoing legitimate need to do so.

When we no longer have a legitimate need to retain personal information, we will either delete it or anonymise it, or, if this is not possible then we will securely store it and isolate it from any further processing until deletion becomes possible.

## INTERNATIONAL DATA TRANSFERS

We will not transfer personal data from this website to countries which are located outside the European Economic Area.

## YOUR RIGHTS

You have legal rights under data protection regulation in relation to your personal data as follows:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below;
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below.
- You have the right to **opt-out of marketing communications** that we send you at any time. You can exercise this right by clicking on the "Unsubscribe" or "Opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below.
- Similarly, if we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. For specific information about our processing of your sensitive category personal data with your consent, please see the "Your consent to us processing your special category personal data" heading below.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available at [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures in place to prevent personal data from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## OUR SUPERVISORY AUTHORITY

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (ICO). It has enforcement powers and can investigate compliance with data protection regulation ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

## HOW TO CONTACT US

If you are not satisfied with the level of information provided, or you would like to exercise any of the above rights or make a complaint, please email: The Data Protection Officer at [compliance@keystoneltd.co.uk](mailto:compliance@keystoneltd.co.uk), or write to: The Data Protection Officer, Keystone Financial Ltd, 54 Pondtail Road, FLEET, GU51 3JF, with enough information to identify you, e.g. name, telephone number, email address.

Please also provide proof of your identity and address and explain the information to which your request relates.