

## Privacy Notice

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Your right to privacy is important to us. This policy will explain your privacy rights and how we process, collect, manage and store those details and how your rights under the General Data Protection Regulation (GDPR) are adhered to.

We collect information about you so we can carry out the service we are contracted to do.

We will never pass your personal data to anyone else, without your explicit permission.

### What information do we collect about you?

We collect information about you when you engage us for financial planning, financial advice and investment management services. This information will relate to your personal and financial circumstances and includes:

- Who you are e.g. your name, date of birth, marital or civil status, nationality and contact details
- Your financial details and circumstances relating to our services e.g. bank details, loans and other liabilities, employment and remuneration information and financial protection and investments plans
- Details you provide about other people relating to our services e.g. joint applicants, dependants (including children) or beneficiaries

It may also include sensitive information (known as 'special category data') such as details about your health, if this is necessary for the provision of our services.

### Why do we need to collect and use your personal information?

We will only ever collect and use your personal information where it is necessary, fair and lawful to do so.

The primary lawful basis that we intend to use to process your information is for the performance of our contract with you. The information that we collect about you is essential for us to be able to effectively carry out the services that you require from us. We also need it to fulfil our legal and regulatory obligations.

Where special category data is required, we will obtain your explicit consent in order to collect and process this information.

### How do we collect your personal information?

We collect your personal information directly from you, from a variety of sources, including:

- Fact finding forms
- Meetings with us
- Emails or letters that you send to us
- Phone conversations with us

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

It is our company policy to record all meetings and telephone calls with you.

We also collect information relating to usage of our website using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information.

### **How will we use the information about you?**

We collect information about you in order to provide you with the services for which you engage us.

### **How will we store your data**

All information you provide to us is stored on Microsoft 365 cloud servers. Please note that this data can only be accessed by current employees of the firm. They will only access this data when they are providing you with advice, or are undertaking administrative tasks internally.

When your data is **stored on paper**, it will be kept in a secure place where unauthorised people cannot access it.

- Paper files will be locked in a drawer or in a filing cabinet and the key/code kept in a safe place where only a limited number of people have access.
- When it is no longer required, the paper files will be shredded and dealt with as 'confidential waste'.
- Our employees will make sure paper and printouts are not left where unauthorised people could see them, like on a printer.

When your data is stored electronically, it will be protected from unauthorised access, accidental deletion, and malicious hacking attempts:

- Data will be protected by strong passwords that are changed regularly and never shared between employees.
- If your data is stored on removable media (like a CD or DVD), these will only be uploaded to an approved cloud computing service. When they are no longer required, they will be cleaned and destroyed.
- Your data is backed up by Dropsuite. These backups are tested monthly.
- Data will never be saved directly to laptops or other mobile devices like tablets or smartphones.
- All device drives are protected with BitLocker encryption and all devices are protected by Microsoft Defender for Endpoints

The Microsoft 365 servers and Dropsuite servers are both located within EEA. If the data that we collect from you has to be transferred to, and stored at, a destination outside the European Economic Area (EEA), we will carry out thorough research first to ensure the third party had sufficient procedures in place to ensure the security and safety of your data. If they cannot evidence this, we will not conduct business with them.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of it. We have several procedures in place to help prevent any breach of any data which all members of staff are aware of and receive training on.

### **Who might we share your information with?**

In order to effectively deliver our services to you we may share your details with third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your information, 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 information and that they will only act in accordance with our written instructions.

Where it is necessary to forward your personal information to a third party, we will use appropriate security measures to protect it in transit.

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

### **How long do we keep hold of your information?**

In principle, your personal information should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain information for specified minimum periods. We reserve the right to retain your information for longer where we believe that it is in our legitimate interests to do so.

If you decide not to appoint us following your initial consultation, we will delete your personal information within three months of your decision.

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

### **Right to access information that we hold about you**

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.

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

### **Money Laundering**

We are required by the anti-money laundering regulations to verify the identity of our clients, to obtain information as to the purpose and nature of the business which we conduct on their behalf, and to ensure that the information we hold is up to date. To assist us with this we use electronic software provided by an external third party. Your

personal details will be stored on their system for the purpose of ongoing monitoring throughout our relationship with you.

## **Cookies**

We use cookies to track visitor use of the website and to compile statistical reports on website activity. We do not use or share information for marketing purposes.

For further information about cookies visit <http://www.allaboutcookies.org/>.

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

## **Other websites**

Our website contains links to other websites. This privacy notice only applies to our website so when you link to other websites you should read their own privacy policies.

## **What can you do if you are unhappy with how your personal information is processed?**

You 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)  
<https://ico.org.uk/make-a-complaint/>

## **Changes to our privacy notice**

We keep our privacy notice under regular review, and we will inform you of any changes when they occur. This privacy notice was last reviewed in March 2025.

## **How to contact us**

Please contact us if you have any questions about our privacy notice or information we hold about you:

by email at [info@mearnscompany.com](mailto:info@mearnscompany.com).

Or write to us at:

Mearns & Company  
Anchor House  
112 Commercial Street  
Edinburgh  
EH6 6NF