

Customer Privacy Notice

Why are we asking you to read this document?

During the course of dealing with us Hawkhurst Alternative Investments Ltd 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 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, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, 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)

The basis upon which our Firm will deal with Your Information

When we speak with you about your 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**.

On occasion, we will use Your Information to enable us to meet **any contractual responsibilities we may owe for wider compliance with any 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.

The basis upon which we will process certain parts of Your Information

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.

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 mortgages and insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties. If we use technology solutions to assist in the collection of Your Information, such as software that is able to verify your identity on-line, then you will be required to provide your consent for us or our nominated processor to access your information in this manner, and details of how such software operates will be provided to you prior to the activation of the service.

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

Sharing and transferring Your Information

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

- Product providers in line with your requirements.
- 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.

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.

We do not envisage that the performance by us of our service will involve Your Information being transferred outside of the European Economic Area.

The basis upon we will deal with Your Information, Your Special Data and Criminal Disclosures

In the course of handling Your Information and Your Special Data/Criminal Disclosures we will:

- record and store Your Information and Your Special Data/Criminal Disclosures on our systems run on secure servers. Your Information and Your Special Data/Criminal Disclosures will be accessed by authorised employees and consultants within, or engaged, by us as necessary for the purposes of supervision, training, quality audits, customer surveys and complaint handling or otherwise to comply with any other legal or regulatory obligation we may have
- use, and where appropriate transmit, Your Information and Your Special Data/Criminal Disclosures to respond to any request from any appropriate regulator, HMRC, the Office of the Information Commissioner or any other regulatory, law enforcement or governmental body

Your Information and Your Special Data/Criminal Disclosures will be retained by us either electronically or in paper format for a minimum of six years and possibly for a longer period where this is required to enable the us to fulfil legal and regulatory obligations.

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 or in paper format for a minimum of six years, or if longer than six years, the duration of this Firm's relationship with you.

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:

David Liddle, Hawkhurst Alternative Investments Ltd, Saxon House, 27 Duke Street, Chelmsford, Essex, CM1 1HT.

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.