



KerrHenderson



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## Private Client Privacy Policy

## About this document

This privacy notice explains how Kerr Henderson (Financial Services) Ltd (the "data controller") uses any personal information we collect about you.

### **What information do we collect about you and how is it collected?**

We collect information about you when you engage us for financial planning/financial advice services. 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.

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

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site.

### **Information about connected individuals**

We may need to gather personal information about your close family members and dependants in order 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. We'll provide a copy of this Privacy Policy 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?**

We must have a lawful basis to process your personal data. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

#### **We have a contractual obligation**

This is the primary legal basis that we intend to use for processing your data. The personal information that we collect about you is essential for us to be able to effectively carry out the services that we have agreed to deliver to you.

#### **We have a legal obligation**

Sometimes, collecting personal data is needed to meet our legal and regulatory obligations. For example, UK anti money laundering legislation may require us to collect personal information to verify your identity.

#### **We will obtain your consent**

Special category data, such as that relating to health matters, is often required to provide our services. When this is required, we will obtain your explicit consent to collect and process this information.

From time to time, we may wish to contact you to offer additional products or services which may be of interest to you. To do this, we will obtain your consent.

You may withdraw your consent at any time by notifying us at our main business address.

#### **We have a legitimate interest**

We rely on legitimate interest to retain relevant data for the purposes of assessing the appropriateness of our services, defending future complaints, and meeting our Professional Indemnity Insurer's expectations.

### **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.



If you would like this document in larger print or in another format, please contact us.

## Who might we share your information with?

If you agree, we may email you about other products or services that we think may be of interest to you.

If you agree, we will pass on your personal information to our group of companies so that they may offer you their products and services.

We won't share your information for marketing purposes with companies outside our group of companies.

In order to deliver our services to you effectively we may send your details to 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 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'll only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party, we will use appropriate security measures (usually either encryption or password-protection) to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

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

During the course of our relationship with you, we will retain personal data necessary to provide our services.

We will take all reasonable steps to keep your personal data accurate and up to date.

We're also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- ▶ Five years for investment business
- ▶ Indefinitely for pension transfers and opt-out business
- ▶ Three years for insurance business

Copies of documentation used to verify your identity (as required by UK anti-money laundering legislation) will be retained for at least five years after our relationship ends.

These are minimum retention periods. We may retain data beyond these periods where we believe it is in our legitimate interests to do so - for example, to defend future complaints, to satisfy the expectations of our professional indemnity (PI) insurers, or to meet other legal or regulatory obligations.

We have assessed that, in such cases, our legitimate interests outweigh the impact on your data protection rights, in line with the UK GDPR.

We will not retain your personal data for longer than six years after our relationship with you has ended unless there is a lawful and justifiable reason to do so.

If you have provided us with personal information but chose not to proceed with our services, we will retain that information for 12 months before erasing it.

You have the right to request the deletion of your personal data. We will comply with such requests, subject to any regulatory or legal obligations that require us to retain certain data.

## 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 in the section "How to contact us".

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 us to correct or remove any information that you think is incorrect.

### Marketing

On occasion we may like to send you information about our products and services and those of other companies in our group which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

### Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information 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 policy only applies to this 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 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

### Changes to our privacy policy

We keep our privacy policy under regular review, and we will place any updates on our web page when they occur. This privacy policy was last updated in March 2025.

### How to contact us

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

✉ By email at [dataprotection@kerrhenderson.com](mailto:dataprotection@kerrhenderson.com)

✉ Or write to us at Data Protection, Kerr Henderson (Financial Services) Ltd, 16 Wellington Park, Belfast BT9 6DJ.



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