



# **Privacy Policy**

## **Capital Risk Management Ltd.**

This Privacy Policy explains how Capital Risk Management Ltd uses your personal information.

### **What information do we collect about you?**

We collect personal information about you when you approach us for financial planning advice. This information will relate to your personal and financial circumstances. We request special category data (such as that about your health) so that we may base our recommendations on your personal circumstances.

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

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

For us to collect and process this information we require your consent.

We intend to use your written consent as the legal basis for: processing your data, performing contractual obligations, and complying with regulatory requirements. We will rely on your consent so that we may gather appropriate information to make our initial and ongoing recommendations.

Once you have signed our Client Agreement, we will process your data to meet our contractual obligations. Following completed transactions, we will be required to hold your information to comply with legal and regulatory obligations. Please refer to the 'How long do we keep hold of your information?' section for further detail.

The information that we collect about you is essential for us to provide our services effectively. Without collecting your personal data, we would be unable to fulfil our legal and regulatory obligations.

### **Information about connected individuals**

We may need to gather personal information about your dependant(s) or close family members to provide you with an effective service. In such cases it will be your responsibility to ensure that you have their consent to pass their information to us. We will make a copy of this Privacy Policy available for them or, if necessary, ask you to forward this to them.



## Who might we share your information with?

To deliver our services to you effectively we may send your details to third parties such as those that are engaged 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 legal contract in place with them to ensure that the nature and purpose of the processing is clear. This will ensure that these third parties are subject to a duty of confidence in processing your data and will 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 to protect your personal data in transit.

We won't share your information for **marketing purposes** with any third parties.

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 our relationship with you we will retain personal data which is necessary to provide our services. We have an obligation to ensure that your personal information is accurate and up to date. We will take all reasonable steps to ensure your data is correct. Please ask us to make amendments or remove any information that you think is incorrect.

We are also subject to regulatory requirements to retain your data for specified minimum periods.

These are, generally:

- Three years for mortgage business
- Three years for insurance business
- Five years for investment business
- Indefinitely for pension transfers and opt-outs

These are **minimum** periods, during which we have a legal obligation to retain your records.

Capital Risk Management have the right to retain data where we believe it is in our legitimate interest to do so and due to the nature of our business, we will retain all records indefinitely. 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. At any time, if you would like a copy of your personal information please email or write to us using the contact details noted below.

If your personal data is processed by an automated system, you have the right to ask us to forward your personal data to another organisation for their use.

## Automated decision making and profiling

The risk profiling and online illustration systems we use will require personal information which we will gather and input onto the system. If you are unsure about the outcome of the automated process you can contact us to discuss or to challenge the outcome.

We take measures to ensure the security of your data. We do not use any special category data (such as data about your health) in the automated process unless it is strictly necessary to deliver our service which we have obtained your consent to do so.

We review the systems we use for accuracy and bias.

## Marketing

We would like to send you information about products and services that may be of interest to you. If you have agreed to receive marketing information, you may opt out at any time.

You have the right, at any time, to stop receiving marketing information from Capital Risk Management Ltd. If you no longer wish to be contacted for marketing purposes, please let us know by email or post.

## Cookies

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

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, some of our website features may not function as a result.

## Other websites

Our website contains links to external websites. Our Privacy Policy only applies to our website so when you access these external websites you will be subject to 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 submit 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

03031 231 113 (local rate)

## Changes to our Privacy Policy

We regularly review this Privacy Policy and will inform you of any changes and ensure an updated version is available on our website. This Privacy Policy was last updated on **27 July 2018 – Version 1.**

## 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:                      willie.crockett@capitalrm.co.uk

Or write to us at:              Willie Crockett – Compliance Officer  
Capital Risk Management  
5 Coates Crescent  
Edinburgh  
EH3 7A