

Privacy Notice

The purpose of this Notice

When we provide our services to you, we will collect personal information about you [and others] and we want to be open and transparent with you as to the types of information we collect about you, why we collect it, how we use it and who we may share it with.

The data controller of your personal information is Epiphany LFP Ltd a limited liability company registered at 696 Yardley Wood Road, Billesley, Birmingham B13 0HY Company number 12051588

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Notice in the 'How to contact us' section.

What type of personal information will be processed and why?

We may ask you to provide personal information by filling in hard copy forms or via our online portal and documents or by corresponding with us by phone, e-mail, letter or otherwise or during the course of our meetings with you. We may receive personal information from your professional connections such as Solicitor and/or Accountant with your prior written permission.

Types of personal information	Why we collect it
Identity details including your name and date of birth, date of marriage (if applicable). We may ask for copies of identification documents, in which case we may collect details including your place of birth and residential address.	<ul style="list-style-type: none">• Only where required in order to gather information to fulfil your planning.
Your contact details including your name, postal address, phone and email address and other personal details about you including your title, job title, marital status and date of birth.	<ul style="list-style-type: none">• To contact you in order for us to manage, administer and provide our services to you.• To respond to any correspondence and service-related enquiries you send to us in respect of our services.• To discuss services for which you apply or may be interested in applying for.• To manage any applications you make for services• To communicate any updates to you including any changes to our services, the terms and conditions of any services which we have provided to you, any changes to this Notice and to our websites.

	<ul style="list-style-type: none"> • To contact you in order to receive your feedback on our services and to participate in related surveys.
Financial information relating to you, including pension contributions, current values, salary, bank, account balances, credit card balance details, mortgage or other debts or investments and payment card details.	<ul style="list-style-type: none"> • To enable us to provide guidance to you on your financial circumstances and the appropriateness of specific courses of action. • We collect and process this personal information for our legitimate business interests. • To enable you to make payments for our services. • We collect and process this personal information as is necessary and once an agreement has been entered into between you and us, so that we can collect payments from your payment card as a form of payment as well as cheque or money transfer.
Details of your dependents (name, address and date of birth).	<ul style="list-style-type: none"> • To enable us to provide you with services that you have requested that would involve, or have an impact on, your dependents (who may be adults or minors). Where those dependents are adults, please make sure that you have their permission to provide us with their personal information.
Details of contact that we have had with you such as meetings with you, fact-finding discussions and documentation, referrals and guidance.	<ul style="list-style-type: none"> • To allow us to provide a professional service to you and to contact you with information about other services of ours that we think you may be interested in).
Details of services you have received.	<ul style="list-style-type: none"> • We collect and process this personal information for our legitimate business interests.
Client experience and other feedback and information you provide to us.	<ul style="list-style-type: none"> • To review your feedback and experience with us so that we can improve our products and services for you and for our other clients.
Information about complaints and incidents.	<ul style="list-style-type: none"> • We collect and process this personal information for our legitimate business interests (and we record calls both for quality and training purposes and to comply with our legal and regulatory obligations).
Recordings of calls we receive or make.	<ul style="list-style-type: none"> • To review your feedback and experience with us so that we can improve our products and services for you and for our other clients.

	<ul style="list-style-type: none"> • We collect and process this personal information for our legitimate business interests (and we record calls both for quality and training purposes and to comply with our legal and regulatory obligations). <p><i>Please see section below entitled "When we record communications" for more information.</i></p>
All of the personal information described above.	<ul style="list-style-type: none"> • We may disclose your personal information to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a court Order, regulatory authority or any other third party with the lawful right to request and receive the personal information that we hold about you (including law enforcement agencies and tax authorities). • We may also use your personal information where it is necessary for us to take legal advice in order to establish our legal rights, to bring a claim against you or any related parties or to defend a claim from you or any related parties. • We collect and process this personal information for our legitimate business interests including to carry out our own internal business planning, compliance, training, audit and quality assurance purposes.

Depending upon the types of services you require, we may also need to collect information from and about you which the law considers to be sensitive, such as data about your physical or mental health, which we refer to as “**special category personal data**”. The special category personal data that we may ask you to provide, and the reasons why we ask you to provide it, are as follows:

Types of special category personal data	Why we collect it
Information about your physical or mental health or condition.	<ul style="list-style-type: none"> • Certain services that you request may require this information. We will usually collect this information in the course of meetings with you, on specific questionnaires or in the process of completing chosen services.

Information about your sex life or sexual orientation.	• We will never ask for this information for our own purposes.
Information about your racial or ethnic origin	• We will never ask for this information for our own purposes.

We will only process the special category personal data listed above with your explicit consent. We ask for your consent to the processing of this data at the end of this Notice. You may choose not to provide us with this consent. **However, please note that if you do not provide us with your consent to collect and process the information listed in the table above:**

- **We may not be able to guide you fully in respect of certain services which require this information in particular those relating to health or life issues that may be considered when completing your planning.**

In some circumstances, we may receive information about you from third parties. In particular, we will receive information about you from Credit Reference Agencies and Fraud Prevention Agencies. This may include details of the products and services you have applied for, those lenders, finance and credit organisations with whom you have (and have had) an agreement with, the amounts advanced, the amount and frequency of repayments and whether you have made your repayments on time and in full. This will help us make the best possible assessment of your financial situation before we decide whether we can provide you with our services and/or recommend any specific products and services. It is in our legitimate interests to process your personal information for this purpose. We may also ask you to provide Letters of Authority to allow us to receive information about you from providers.

When we record communications

We, and persons acting on our behalf, may record and/or monitor communications (including telephone conversations over landlines and mobile phones, emails, instant messaging, chat rooms, fax and other electronic communications) between our staff and you. We only record communications between us for training purposes only.

Who might my personal information be shared with?

We may disclose your personal information to the following categories of recipients:

- To our **suppliers and partners** in order for them to help us provide our services to you, this includes:
 - to our **IT systems providers** to assist us with providing you with an efficient, modern and professional service;
 - to a **prospective buyer** (and its agents and advisers) in the event we intend to sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your personal information could form part of one of the assets we sell, provided that

we inform the buyer it must use your personal information only for the purposes described in this Notice. We will never rent or sell your personal information other than as part of a sale of our business;

- to any **national and/or international regulatory, enforcement body, government agency or court** where we believe disclosure is necessary
 - (i) as a matter of applicable law or regulation (including where we are required by law to provide information to organisations such as HMRC),
 - (ii) to exercise, establish or defend our legal rights, or
 - (iii) to protect your vital interests of those of any other person; and
- to any **other person with your consent** to the disclosure or where we are permitted to do so by law.

Our legal basis for processing personal information

Our legal basis for collecting and using your personal information will depend on the personal information concerned and the specific context in which we collect it. In respect of the personal information and the purposes for which we may process your personal information which are set out in this Notice, we have confirmed the legal basis upon which we collect and process your personal information in the 'What type of personal information will be processed and why?' section above.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you or with your explicit consent, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

Your data protection rights

You have the following data protection rights:

- 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** 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 process 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.)

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

Data retention

We retain personal information we collect from you where we have an ongoing legitimate need to do so, for example:

- to provide you with a service you have requested us to provide,
- to perform our contractual obligations to you;
- to comply with applicable legal, tax or accounting requirements;
- to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, regulatory authority or ombudsman.

When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further

processing until deletion is possible.

Any paper records are shredded in our industrial shredder which is then collected as commercial confidential waste by Biffa.

Updates to this Notice

We may change or update this Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

Communications about our services

We would like to contact you from time to time with details of new products, services, promotions, and other information which may be of interest to you. Please tick the relevant boxes below if you **do not want** to receive this information from us:-

by email

by post

by text message

by telephone

Your consent to us processing your special category personal data

As explained above, we can only process the special category personal data listed in the table on page [3] with your explicit consent. We ask for your explicit consent to the processing of this data below. You may choose not to provide us with this consent. **However, please note that if you do not provide us with your explicit consent to process the special category personal data listed above, this may affect our ability to advise you on your options and it may limit the products and services which are available to you and may result in your application being rejected or result in higher quotes being provided to you** (in particular those relating to health or life insurance).

Do you consent to us processing the special category personal data listed in the table on page [3]

Yes

No