

Our Privacy Policy - your rights, your information and how we use it

MacDonald Group and Partners& are trading styles of Partners& Ltd, which are authorised and regulated by the Financial Conduct Authority (FCA). Our FCA registration number is 308261.

We are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect will be processed by us. Please read this privacy policy carefully to understand our views and practices and your rights regarding your personal data. By visiting partnersand.com you are accepting and consenting to the practices described in this policy.

For the purpose of data protection legislation, the data controller is Partners&, MRIB House, 25 Amersham Hill, High Wycombe, HP13 6NU.

Our Data Protection Manager is Charles Bettinson. If you have any queries, complaints or requests please contact our DPM at Charles.Bettinson@partnersand.com or call 03300 940177.

What information do we collect from you?

We will collect and process the following data about you:

- Information you give us and that we collect throughout our relationship with you. This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, email or otherwise. The information you give us may include name and address, dates of birth, National Insurance numbers, driving licence details, health, ethnic origin, criminal convictions, Bank Account and financial information and email addresses.
- Information we collect from your use of our site. With regard to each of your visits to our site we will automatically collect the following information:
- Technical information, such as the Internet protocol (IP) address used to connect your device to the Internet, whereabouts you connected to our service, your internet service provider (ISP), and what type of device you are using to access our service.
- Information we collect when you call us. If you call us we will automatically collect the phone number from which you are calling.
- Information we receive from other sources. We may need to collect sensitive personal data including information about your health, ethnic origin, or criminal prosecutions from third parties such as employers and credit reference agencies, fraud prevention agencies and other similar organisations in order to provide you with our services.
- Providing us with your details online. This is information you may choose to provide us with using the contact us page on our site. It includes your name, telephone number, and email address. Please let us know if any of this information changes so we can keep our records up to date.

Why do we collect this information?

We use this information in the following ways:

- In order to take steps necessary to assess whether we can enter into a contract with you and in order to perform our contract with you. This includes carrying out our obligations to you and providing you with our products and services.
- For the purpose of improving our service to you, to ensure that content from our site is presented in the most effective manner for you and for your device.
- To deal with any legal queries relating to your use of our service.
- To provide you with service communications so that you receive a full and functional service and so we can perform our obligations to you. These may be sent by email, post or by phone. These will include notifications about changes to our service.
- To provide you with marketing communications including, with your permission, information about other goods and services we offer that are similar to those that you have already purchased or enquired about.

Information we collect from your use of the site

We will use this information for the following purposes:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you and for your device.
- As part of our efforts to keep our site safe and secure.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- Information we collect throughout our relationship. We will use this information to help us provide you with our services.
- Information we receive from other sources. See the 'Who might we share your information with?' section below for details of how we use information in conjunction with our associated third parties.

How long do we keep hold of your information?

We will keep information about you for a maximum of 6 years after the end of our relationship with you (and longer in respect of certain claims) unless legal or regulatory obligations require otherwise or we are required to remove such data from our records.

We will not retain your information if you do not take up our services unless you would like us to contact you again in the future.

Who might we share your information with?

We will only supply your personal information to other parties where such a transfer is a necessary part of the activities that we undertake, where you give us consent or where we are required to do so by law or regulation. You agree that for the purposes set out in the 'Why do we collect this information?' section above, we have the right to share your personal information with:

- Selected associated third parties, some of whom we appoint to provide services, including: business partners, subsidiaries, suppliers and sub-contractors for the performance of any contract we enter into with you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Customer survey providers in order to receive feedback and improve our services.
- Any member of our group, which means our subsidiaries.

Additionally, we will disclose your personal information to the relevant third party:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others. [This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction].

How is your data stored and kept secure?

At Partners& we take your safety and security very seriously and we are committed to protecting your personal and financial information. All information kept by us is stored on our secure servers.

We do not transfer your data outside the European Economic Area (“EEA”). If in future we do need to transfer your data outside the EEA, we will only do so if adequate protection measures are in place in compliance with data protection legislation.

What are your rights?

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at Partners&, MRIB House, 25 Amersham Hill, High Wycombe, HP13 6NU.

Under data protection law, you have rights which are subject to legal and regulatory requirements, including:

- Your right of access – You have the right to ask us for copies of your personal information.
- Your right to rectification – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing – You have the right to ask us to restrict the processing of your information in certain circumstances. You have the option to “opt-out” of us sending you any marketing communications
- Your right to object to processing – You have the right to object to the processing of your personal data in certain circumstances.

- Your right to data portability – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>.

Changes to our privacy policy

We may need to make changes to our Privacy Policy from time to time, so please check our website regularly for updates. If there are important changes such as ones impacting where your personal data will be processed, we will contact you to let you know.

This version (V3) of our Privacy Policy was last updated **June 1, 2022**

What are cookies?

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website you are visiting.

Contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Partners&, MRIB House, 25 Amersham Hill, High Wycombe, HP13 6NU.