

Data Privacy Notice

08/04/2026

Data Privacy Notice

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact *us* and supervisory authorities in the event you have a complaint.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Radcliffe & Co Life & Pensions Limited collects, *uses* and is responsible for certain personal data about you. When *we* do so *we* are required to comply with *data protection regulation* and *we* are responsible as a *data controller* of that personal data for the purposes of those laws.

When *we* mention “Radcliffes *we*”, “*us*” or “*our*” *we* are referring to Radcliffe & Co Life & Pensions Limited.

Radcliffe & Co Life & Pensions Limited are a company registered in England and Wales (2114114) Radcliffe & Co Life & Pensions Limited, whose registered office is at Meridians House, 7 Ocean Way, Ocean Village, Southampton, Hampshire. SO14 3TJ. Radcliffe & Co Life & Pensions Limited is authorised and regulated by the Financial Conduct Authority. Radcliffe & Co Life & Pensions Limited Financial Services Register number is 125160.

We provide you with Independent Financial Advice.

The personal data we collect and use

In the course of providing *our* service to you *we* may collect the following personal data when you provide it to *us*:

- contact information
- identity information

- financial information
- employment status
- lifestyle information
- health information
- data about criminal convictions or offences
- details of any *vulnerability*
- details of your dependents and/or beneficiaries under a policy **(If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to *us*. You might find it helpful to show them this privacy notice and if they have any concerns please contact *us* in one of the ways described below.)**
- *product* and investment details
- your attitude towards investment risk and your capacity for loss.

Information collected from other sources

We also obtain personal data from other sources in the *course* of providing our *intermediary and advice services*. Where *we* obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with *us* and, where necessary, ask permission before sharing information with *us*.

The personal data *we* obtain from other sources may include the following:

- From *lenders and/or product providers*:
 - *product* details
- From identification and verification checking agencies:
 - *identity* information
 - *sanction check* information

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'll 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 other 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'll 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's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit, including password protection, encryption of data and two-factor authentication.

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.

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and then have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 02380 222444

By email: data.protection@radcliffe-ifa.co.uk

By Post: Meridians House, 7 Ocean Way, Ocean Village, Southampton, Hampshire. SO14 3TJ

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of our monthly email newsletter. This will remove you from any further marketing and your preference will be recorded on our main system. You will however still receive information from us in relation to your services that we provide and you may also hear from us for any legitimate reason such as a change in legislation.

Whether information has to be provided by you, and if so why.

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with *intermediary services*.

How long do we keep hold of your information?

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

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

These are, generally:

- Five years for investment business
- Three years for mortgage business
- Indefinitely for pension transfers and opt-out business
- Three years for insurance business These are minimum periods, during which we have a legal obligation to retain your records.

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We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see 'Your rights' below.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We will always ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask *us* to confirm whether or not *we* have and are using your personal data. You can also ask to get a copy of your personal data from *us* and for information on how *we* process it.

To rectify / erase personal data

You can ask that *we* rectify any information about you which is incorrect. *We* will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that *we* erase your personal data if you think *we* no longer need to use it for the purpose *we* collected it from you.

You can also ask that *we* erase your personal data if you have either withdrawn your consent to *us* using your information (if *we* originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where *we* have used it unlawfully or where *we* are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where *we* need to keep using your personal data in order to comply with *our* legal obligation or where *we* need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that *we* restrict *our* use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and *we* need to verify it;
- where *our* use of your personal data is not lawful but you do not want *us* to erase it;
- where the information is no longer required for the purposes for which it was collected but *we* need it to establish, exercise or defend legal claims; or

- where you have objected to *our* use of your personal data but *we* still need to verify if *we* have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where *we* have your consent to use it; or *we* need to use it to establish, exercise or defend legal claims, or *we* need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which *we* have justified on the basis of *our* legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, *we* may continue to use the personal data if *we* can demonstrate that *we* have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask *us* to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where *we* use your personal data in order to perform a contract with you, or where *we* asked for your consent to use your personal data. This right does not apply to any personal data which *we* hold or process outside automated means.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer/Data Privacy Manager at data.protection@radcliffe-ifa.co.uk or Meridians House, 7 Ocean Way, Ocean Village, Southampton, Hampshire. SO14 3TJ;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* (www.ico.org.uk). We ask that you please attempt to resolve any issues with us before the ICO.

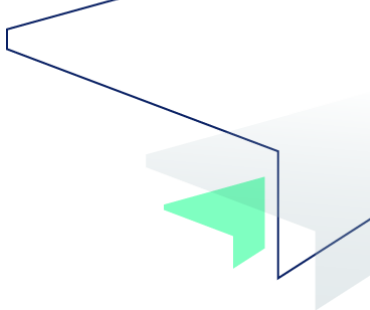
How to contact us

Please contact our Data Protection Officer/Data Privacy Manager if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer/Data Privacy Manager, please send an email to data.protection@radcliffe-ifa.co.uk or write to: Meridians House, 7 Ocean Way, Ocean Village, Southampton, Hampshire. SO14 3TJ

Clients consent

We have provided you with a copy of our Privacy Notice which provides information about the nature of our personal data processing activities and includes details of our retention and deletion policies as well as your rights of access to the personal information that we hold on you.



Sensitive personal data

As explained in our Privacy Notice there are certain categories of personal data that are sensitive by nature. These categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health.

Depending on the nature of the products and services that you engage us for, we may need to obtain your sensitive personal data particularly in relation to health. In the case where we need to process special category (sensitive) data as described above, we require your consent by indicating your agreement to the following statement:

I / we consent to the processing of sensitive personal data as far as it is necessary for the services I / we require from Radcliffe & Co and any company associated with us.

Client Signature:	
Client Name:	
Date of Signature:	

Client Signature:	
Client Name:	
Date of Signature:	

Please note that you may withdraw this consent at any time by notifying us at our main business address.

Marketing

As part of our commitment to you, we aim to keep you regularly informed of various updates and events. I / we consent to be contacted for the various marketing purposes:

- Marketing – quarterly newsletters including a variety of financial and topical updates, investment committee, and Radcliffe updates.
- Client events – we hold regular client events throughout the year, and would like to invite you to attend these, depending on numbers and availability.

If you agree to be contacted on any of the above marketing methods, they will be sent via email.

Please note that you may withdraw this consent at any time by notifying us at our main business address or by contacting your financial adviser / adviser support directly.

Glossary of Terms

we, us or our

Radcliffe & Co Life & Pensions Limited a company registered in (England and Wales) company number [2114114] and having its registered office at [Meridians House, 7 Ocean Way, Ocean Village, Southampton, Hampshire. SO14 3TJ]

contact information

these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address

data controller

means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with *intermediary services*

data protection regulation

applicable data privacy and protection laws

employment status

this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance

FCA

the Financial Conduct Authority, being the independent watchdog that regulates financial services – our number 125160

financial information

this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60

health information

this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history

identity information

this is any information that can be used to distinguish a person or verify their identity, such as

name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number

intermediary services

these are the services we provide to you in relation to the products, which may include:

- Independent Financial Planning Advice
- Pension advice
- Investment advice
- Advice on general insurance
- Advice on mortgages
- Tax advice

lenders

a mortgage lender (for a list of current lenders which we work with, please contact *us* – see How to contact *us* above)

lifestyle information

this includes both work and leisure behaviour patterns. Most relevant to your products may be your smoker status, alcohol consumption, health, retirement age and exercise habits

product

this is an investment, pension, mortgage, protection and/or general insurance product in respect of which we provide *intermediary services* to you

product provider

a company which provides investment, pension, protection and/or general insurance products (for a list of product providers which we work with, please contact *us* – see *How to contact us* above)

sanction check information

this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering

vulnerability

a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence)