Privacy Notice

Swakeleys Associates Ltd is committed to protecting your personal information and your privacy.

We will always comply with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), including any updates or changes to those laws.

This Privacy Notice tells you how we will handle your personal information when you contact us, or you use any of our services.

We'll tell you:

- **The type of information we process;**
- **How we get the personal information and the reasons we have it;**
- **How we store personal information;**
- **How we may share personal information;**
- **Your rights;**
- **How to complain**

We keep our data protection arrangements under regular review. This notice was last updated in 02/11/2026.

Swakeleys Associates Ltd is the controller for the personal information we process.

You can contact us, including by phone, email and post.

Telephone: 07833456775 E-mail: r2010jones@hotmail.co.uk

Post: 149 Swakeleys Road, Ickenham, UB10 8DL

The type of information we process

In order to provide our services and verify your identity, we need to collect and process the following information:

- Personal identifiers, for example name and contact details, National Insurance number and date of birth;
- Personal and financial information;
- 'Special Category data' information, examples of which might include details of your health, sexuality or religious beliefs.

Information relating to usage of our website may be collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information.

We do not currently use any information collected from the website to personalise your repeat visits to our site.

How we get the personal information and the reasons we have it;

Most of the information we process is provided directly by you to help us to provide you with financial advice and services.

We use the information you provide to verify your identity, assess your financial needs, and recommend and arrange the best solutions for you.

We are required to have a 'lawful basis' in order to process your data.

i. The primary legal basis for processing date is **for the performance of our contract with you**, i.e. it is necessary in order for us to be able to deliver the services.
ii. Where you provide us with "Special Category Data" (including race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation), we must obtain **explicit consent** from you for processing this data. This consent must be for a specific purpose and may be withdrawn by you at any time.
iii. **Consent** would also be required in order to process your data for marketing purposes.
iv. There may be data processed by us in order **to meet a legal obligation**. This would include Anti-money laundering checks for example.
v. We may also process data where we have a **'legitimate interest'**, for example in the pursuance of debt.
vi. **Recognised legitimate interest**. the processing is necessary for one of the pre-approved purposes. These are:
    i. safeguarding "vulnerable" people;
    ii. responding to emergencies;
    iii. preventing or investigating crime;
    iv. national security, public security and defence; and
    v. responding to requests made by bodies acting in the public interest, for processing by those bodies for purposes laid down in law (for example, to help a government agency discharge its duties and functions).
vii. **Vital interests** – the processing is necessary to protect someone's life
viii. **Public task**: the processing is necessary for you to perform a task in the public interest or for your official functions and the task or function has a clear basis in law.

How we store your personal information

We take the security of personal data extremely seriously.

Your information is securely stored on our computer systems.

Any paper records will be held securely and shredded at the earliest opportunity.

We have arrangements in place to ensure that personal &/or confidential information is protected so as to minimise the threat of loss or damage.

We will keep your records indefinitely as this enables us to provide any ongoing services and handle any future queries, claims or complaints. It may also be required to meet legal or regulatory obligations.

Where you ask us to delete any personal date, we will comply with requests subject to the restrictions of any regulatory obligations and legitimate interests as noted above.

Sharing your personal information

We will not share personal data with any third parties for the purposes of direct marketing.

We may share information with electronic verification providers, compliance & product providers or other financial providers such as lenders, banks, insurers, fund managers & platform providers.

We may use data processors who are third parties who provide elements of service for us. We have contracts in place with such data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from Swakeleys Associates Ltd. They will hold this securely and retain it for the period we instruct.

We may be required to pass on your personal information to the Financial Conduct Authority (FCA), Financial Ombudsman Service (FOS), the Financial Services Compensation Scheme (FSCS) or the Information Commissioner's Office (ICO) to help with an investigation or complaint; or to other authorities as required by the law.

Our websites, reports, newsletters and other services may contain links to websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Your rights

Under data protection law, you have a number of rights 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 personal 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 personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

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

Your right to complain – You have the right to complain directly to the data controller about how your personal data has been handled.

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.

Please contact us at Swakeleys Associates if you wish to make a request.

Our contact details are shown on the first page of this document.

How to complain

If you have any concerns about our use of your personal information, you must first raise your data protection complaint with ourselves as the data controller who holds or has processed your data.

You can make a complaint to us in person or by telephone, email or by post. Our contact details are shown on the first page of this document.

We will:

- Acknowledge your complaint within **30 days** of receipt.
- Investigate and respond to you "without undue delay".
- Keep you informed of the progress and notify you of the final outcome.

If you are not happy with our response, you can escalate your complaint to the ICO.

The ICO's address:

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.ukInformation Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

It is important that you understand your rights and our responsibilities. If you have any questions at all about this notice or would like any points clarifying, please get in touch with us.