



1. Introduction

This document sets out the obligations of **Business Finance Solutions UK is a trading style of WLR F&I Solutions Limited** who is authorised and regulated by the and regulated by the Financial Conduct Authority under number FRN 912005/732760 (the '**Firm**') regarding data protection and your rights as our client ('data subjects') in respect of your personal data under the UK General Data Protection Regulation ('UK GDPR') which sits alongside the Data Protection Act 2018 ('DPA 2018'). We are also subject to the EU General Data Protection Regulation ('EU GDPR') in relation to services we offer to individuals and our wider operations in the European Economic Area ('EEA').

Our ICO Registration Number is ZA579504.

Our contact details are as follows:

Address: The Hemington, Millhouse Business Centre, Station Road, Castle Donington, DE74 2NJ

Email: geri@strategiclife.co.uk

Telephone number: 0345 505 0888

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

The UK GDPR defines "personal data" as any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This document sets the Firm's obligations regarding the collection, processing, transfer, storage, and disposal of your personal data. The Firm has implemented procedures and policies for our employees, agents, contractors, or other parties working on behalf of the Firm to follow at all times.



The Firm is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. **Lawful, Fair, and Transparent Data Processing**

The UK GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights as the data subject.

As you are a client of the Firm and have contracted with us to provide you with the necessary legal assistance, under the UK GDPR, we are allowed to process your personal data as a necessity for the performance of the contract.

We collect and use your personal data to provide legal services. If you do not provide personal data we ask for, it may delay or prevent us from providing those services.

1. **The Data Protection Principles**

The UK GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

- Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to the implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of the data subject.



- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

3. Keeping You Informed

The Firm shall provide the information set out below to every client.

Where your personal data is collected directly from you, you will be informed of its purpose at the time of collection; and

Where your personal data is obtained from a third party, you will be informed of its purpose:

- If the personal data is used to communicate with you, when the first communication is made; or
- If the personal data is to be transferred to another party, before that transfer is made; or
- As soon as reasonably possible and in any event, not more than one month after the personal data is obtained.

4. How Your Personal Data Is Collected

We collect most of this information from you, direct. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to investments/mortgages/finance and insurance. You will provide information to us verbally and in writing, including email.

However, we may also collect information:

- From publicly accessible sources, e.g. Companies House or the Electoral Register;
- Directly from another associated company or trading style of the White Label Resources Group (WLR).
- Directly from a third party, e.g.:
 - Sanctions screening providers;
 - Client due diligence providers;
- From a third party with your consent, e.g.:
 - Your bank or building society, another financial institution or advisor;
 - Credit reference agencies;
 - Consultants and other professionals we may engage in relation to your matter;



- Your employer and/or trade union, professional body or pension administrators;
- Your doctors, medical and occupational health professionals;
- Via our website—we use cookies on our website (for more information on cookies, please see our **Cookies Policy** on our website).
- Via our information technology (IT) systems.

5. **How and Why We Use Personal Data**

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- Where you have given consent;
- To comply with our legal and regulatory obligations;
- For the performance of a contract with you or to take steps at your request before entering into a contract; or
- For our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

When we speak with you about your investment/investment/mortgage/finance and/or insurance requirements we do so on the basis that both parties are entering a contract for the supply of services.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you.	To perform our contract with you or to take steps at your request before entering into a contract.
Preventing and detecting fraud against you or us.	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us.
Conducting checks to identify our clients and verify their identity.	To comply with our legal and regulatory obligations.



What we use your personal data for	Our reasons
Screening for financial and other sanctions or embargoes. Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator.	
To enforce legal rights or defend or undertake legal proceedings.	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to protect our business, interests and rights.
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	To comply with our legal and regulatory obligations.
Ensuring policies are adhered to, e.g. policies covering security and internet use.	For our legitimate interests, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you.
Operational reasons, such as improving efficiency, training and quality control.	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price.
Ensuring the confidentiality of commercially sensitive information.	Depending on the circumstances: —for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information; —to comply with our legal and regulatory obligations.
Statistical analysis to help us manage our	For our legitimate interests, i.e. to be as efficient as



What we use your personal data for	Our reasons
business.	we can so we can deliver the best service to you at the best price.
Preventing unauthorised access and modifications to systems.	Depending on the circumstances: —for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us; —to comply with our legal and regulatory obligations.
Protecting the security of systems and data used to provide services.	To comply with our legal and regulatory obligations. We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us.
Updating client records	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract; —to comply with our legal and regulatory obligations; —for our legitimate interests, e.g. making sure we can keep in touch with our clients about existing and new services.
Statutory returns	To comply with our legal and regulatory obligations.
Ensuring safe working practices, staff administration and assessments.	Depending on the circumstances: —to comply with our legal and regulatory



What we use your personal data for	Our reasons
	obligations; —for our legitimate interests, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.
Marketing our services to: —existing and former clients; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests, i.e. to promote our business to existing and former clients.
Credit reference checks via external credit reference agencies where applicable.	For our legitimate interests, i.e. to ensure our clients are likely to be able to pay for our services.
External audits and quality checks.	Depending on the circumstances: —for our legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards; —to comply with our legal and regulatory obligations.
To share your personal data with WLR, with your consent, to enable them to perform a contract with you or provide a service to you.	Depending on the circumstances: —For WLR to perform a contract with you or provide a service to you or to take steps at your request before entering into such a contract or service;
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets.



What we use your personal data for	Our reasons
restructuring, including a merger, acquisition, asset sale or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary.	

6. How and Why We Use Your Personal Data—Special

Where you ask us to assist you with, for example, your insurance/ethical investments, in particular life insurance and insurance that may assist you in the event of accident or illness, we will ask you for information about your ethnic origin, your health and your medical history.

Certain personal data we collect is treated as a special category to which additional protections apply under data protection law:

- Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership;
- Genetic data;
- Biometric data (when used to uniquely identify an individual);
- Data concerning health, sex life or sexual orientation;
- Historic or Current Criminal Convictions or Offences.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- We have your explicit consent;
- The processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent;
- The processing is required to enable us to perform our contract with you or provide a service to you or to take steps at your request before entering into a contract. The data must be capable of being exchanged freely between insurance intermediaries such as our Firm and insurance providers, to enable customers to secure the important insurance protection that their needs require; or
- The processing is necessary to establish, exercise or defend legal claims.



If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

7. Sharing of Personal Data

During our retainer with you, we may share your information with the following entities: -

- WLR;
- Investment Providers;
- Mortgage Lenders;
- Finance Lenders;
- Insurance Providers;
- Compliance Providers
- Product Specialists
- Estate Agents
- Providers of legal services such as Estate Planners, Conveyancers, Surveyors and Valuers (in each case where we believe this to be requirements due to your particular circumstances)
- Accountants;
- Our Professional Advisors;
- Mediation and Arbitration Service providers;
- Government Bodies;
- Auditors;
- IT support, infrastructure and system providers;
- Employees of the Firm;
- Contractors to the Firm working on your service;
- Postal service providers, including couriers;
- Insurers and Brokers;
- Other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- Third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- Credit reference agencies;



- Other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency, usually, information will be anonymised, but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Where we outsource to third party providers, we only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Privacy Policy.

8. Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes. This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by emailing your request to our **Data Protection Officer** at geri@strategiclife.co.uk or writing to them at:

The Hemington
Millhouse Business Centre
Station Road
Castle Donington
DE74 2NJ

or calling 0345 505 0888.



We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

9. Personal Data Collected, Held, and Processed

The following personal data is collected, held, and processed by the Firm:

Data Ref.	Type of Data	Purpose of Data
Client Name	Your Name	To identify you.
Gender	Your Gender	To identify you.
Nationality	Your Nationality	To identify you.
Address	Your Address	To identify you and to send letters to you.
Email address	Your email address	To send communication via email.
Mobile telephone	Your mobile telephone number.	To communicate with you by phone and/or by text.
Date of Birth	Your date of birth	To identify you.
Civil/Marital Status	Your civil/marital status	To identify you.
Passport Number	Your passport details	To identify you and comply with Money Laundering Regulations – where applicable.
Driving licence number	Your driving licence details	To identify you and comply with Money Laundering Regulations – where applicable.
Utility Bill	Your utility bill (s)	To identify you and comply with Money Laundering Regulations – where applicable.
Credit Check	Your finance/credit information.	Information to enable us to undertake a credit or other financial checks on you.
Employment and Remuneration Information	Your financial information.	Your financial details so far as relevant to your instructions, e.g. salary/bonus schemes/overtime/sick pay/other benefits, Employment history.
Bank Account Details	Your financial information.	Information to enable us to perform our contract with you.
Tax Information	Your financial information.	Information to enable us to perform our contract with you.
Loans, Insurance and Credit Commitments	Your financial information.	Information to enable us to perform our contract with you.
Personal Credit History	Your financial information.	Information to enable us to perform our contract with you.



Data Ref.	Type of Data	Purpose of Data
Sources of Income and Expenditure	Your financial information.	Information to enable us to perform our contract with you.
Family Circumstances and Details of Dependents	Your family circumstances	Information to enable us to perform our contract with you.
Health Status and History, Details of Treatment and Prognosis, Medical Reports	Your health information	Information to enable us to perform our contract with you.
Client Service Data	Your access to our communication systems.	Information about your use of our IT, communication and other systems, and other monitoring information.

10. Personal Data Collected for Compliance with the Firm's Regulatory Responsibilities

Pursuant to Regulation 41 of *The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017* and *The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 and 2022*, the Firm will only use any personal data provided for the purpose of complying with the regulations and for the prevention of money laundering or terrorist financing.

11. Where Your Personal Data Is Held

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see **section 7 ('Sharing of Personal Data')**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see **section 13 ('Transferring your personal data out of the UK and EEA')**.

12. How Long Your Personal Data Will Be Kept For

We will not keep your personal data for longer than we need it for the purpose for which it is used or as agreed with you.



As a general rule, if we are no longer providing services to you, we will delete or anonymise your account data after **seven** years. However, different retention periods apply for different types of personal data and for different services.

Following the expiry of the relevant retention period, we will delete or anonymise your personal data.

13. Transferring Your Personal Data Out of the UK and EEA

The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases, we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

As we are based in the UK, we may also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- i. In the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an '**adequacy regulation**') further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#).
- ii. In the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an '**adequacy decision**') further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#).
- iii. There are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- iv. A specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK, we do so on the basis of an adequacy decision. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK unless we can do so on the basis of an



alternative mechanism or exception provided by UK data protection law and reflected in an update to this notice.

Where we transfer your personal data outside the EEA we do so on the basis of an adequacy decision. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable data protection law and reflected in an update to this notice.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with **section 25** (*'Changes to this Privacy Notice'*).

14. Transferring Your Personal Data Out of the UK and EEA - Further Information

If you would like further information about data transferred outside the UK/EEA, please contact us.

15. Your Rights (As a Data Subject)

The UK GDPR sets out the following rights applicable to data subjects (please refer to the parts of this notice indicated for further details):

- The right to be informed - Individuals have the right to be informed about the collection and use of their personal data;
- The right of access to your personal data - Individuals have the right to access and receive a copy of their personal data and other supplementary information;
- The right to rectification - Individuals have the right to have inaccurate personal data rectified or completed if incomplete;
- The right to erasure (also known as the 'right to be forgotten') - Individuals have the right to have their personal data erased;
- The right to restrict processing - Individuals have the right to request the restriction or suppression of their personal data;
- The right to data portability - This allows individuals to obtain and reuse their personal data for their own purposes across different services;
- The right to object - this gives individuals the right to object to the processing of their personal data in certain circumstances, it also gives individuals the absolute right to stop their data being used for direct marketing;



- Not to be subject to automated individual decision making - this allows individuals to object to their data being used in an automated individual decision-making process (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process;
- The right to withdraw consent.

16. Data Subject Access Requests

You may make a **Subject Access Request ('SAR')** at any time to find out more about the personal data that the Firm holds about you, what it is doing with that personal data, and why.

If you wish to make a SAR, you may do so in writing. SARs should be addressed to the Firm's **Data Protection Officer**, who is **GERI CONNIFFE**. You should send your request by: email to: **geri@strategiclife.co.uk** or post to: **The Hemington, Millhouse Business Centre, Station Road, Castle Donington, DE74 2NJ**. You can also make the request by telephone to: **0345 505 0888**.

Responses to an SAR shall normally be made within one month of receipt, however, we may extend by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, you shall be informed.

All SARs received shall be handled by the Firm's **Data Protection Officer**.

The Firm does not charge a fee for the handling of normal SARs. However, we reserve the right to charge reasonable fees for additional copies of information that has already been supplied to you, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

17. Rectification of Personal Data

You have the right to require us to rectify any of your personal data that is inaccurate or incomplete.

The Firm shall rectify the personal data in question, and inform you of that rectification, within one month of you informing the Firm of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.

In the event that any affected personal data has been disclosed to third parties, those parties shall



be informed of any rectification that must be made to that personal data.

18. Erasure of Personal Data

You have the right to request that the Firm erases the personal data it holds about you in the following circumstances:

- It is no longer necessary for the Firm to hold your personal data with respect to the purpose(s) for which it was originally collected or processed;
- You wish to withdraw your consent to the Firm holding and processing your personal data;
- You object to the Firm holding and processing your personal data (and there is no overriding legitimate interest to allow the Firm to continue doing so);
- The personal data has been processed unlawfully;
- The personal data needs to be erased in order for the Firm to comply with a particular legal obligation.

Unless the Firm has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and you will be informed of the erasure, within one month of receipt of your request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, you shall be informed.

In the event that any personal data that is to be erased in response to your request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

19. Restriction of Personal Data Processing

You may request that the Firm ceases processing the personal data it holds about you. If you make such a request, the Firm shall retain only the amount of personal data concerning you (if any) that is necessary to ensure that the personal data in question is not processed further.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

20. Objections to Personal Data Processing

You have the right to object to the Firm processing your personal data based on legitimate interests



and direct marketing (including profiling).

Where you object to the Firm processing your personal data based on its legitimate interests, the Firm shall cease such processing immediately, unless it can be demonstrated that the Firm's legitimate grounds for such processing override your interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

Where you object to the Firm processing your personal data for direct marketing purposes, the Firm shall cease such processing immediately.

21. Withdrawing Consent

If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time.

You may withdraw consents by contacting our **Data Protection Officer** by email: geri@strategiclife.co.uk or by post: The Hemington, Millhouse Business Centre, Station Road, Castle Donington, DE74 2NJ or by telephone: 0345 505 0888.

Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

22. More Information on How to Exercise Your Rights

To find more information on how you may exercise your rights as a Data Subject, please see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

23. Keeping Your Personal Data Secure

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

We also have procedures 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.



24. How to Complain

Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to Contact Us'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the

- The UK Information Commissioner's Office.
- A relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA.

The UK Information Commissioner's Office may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

25. Changes to this Notice

We may change this notice from time to time. If we do, we will inform you.

26. How to Contact Us

You can contact us or our Data Protection Officer by post, email or telephone if you have any questions about this privacy notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.

The contact details are:-

Address: The Hemington
Millhouse Business Centre
Station Road
Castle Donington
DE74 2NJ

Email: geri@strategiclife.co.uk

Telephone number: 0345 505 0888