

## Data privacy

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.

## Who we are

CDN Life Solutions 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 "we", "us" or "our" we are referring to CDN Life Solutions. CDN Life Solutions is authorised and regulated by the Financial Conduct Authority. CDN Life Solutions Financial Services Register number is 401833.

We provide you with lifelong financial and investment planning 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 such as name, telephone numbers, addresses and email addresses
- date of birth
- gender
- marital status
- 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.)
- identity information such as passport, drivers licence, birth certificates, marriage certificates
- national insurance number, tax codes
- bank account details
- financial information
- salary and income details
- employment status
- expenditure
- lifestyle information, goals and ambitions
- health information
- data about criminal convictions or offences
- details of any *vulnerability*
- details of existing product and investments you hold
- Wills, power of attorney and trust details

## Information collected from other sources

We also obtain personal data from other sources in the course of providing our *intermediary 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
- From third party advisers:
  - Relating to legal services
  - Relating to accountancy services
  - Relating to mortgage services (residential and commercial)
  - Relating to discretionary fund management
  - Relating to banking services
  - HM Revenue & Customs

## How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
To provide you with a fully comprehensive financial planning service which will typically include an annual planning meeting to review your circumstances and needs to ensure that our advice and recommendations remain suitable (including lifetime cashflow planning and measuring appetite for risk).	Performance of contract	
Comply with relevant 'Know Your Client' obligations and other requirements imposed by regulatory bodies to combat fraud, money-laundering and other criminal activities.	Compliance with a legal obligation	
To apply for quotations for protection and/or general insurance products on your behalf. To apply for products on your behalf.	Performance of a contract	Product providers
To apply to third party advisers to provide you with advice in relation to law, accountancy, residential mortgages, commercial mortgages, banking, business consultancy.	Consent	You will be provided with details of the firm if referrals are made
To retain records of any services or advice provided to you by us in order to defend potential legal claims or complaints.	Legitimate Interest	External supplier(s) of data storage and data hosting services to retain records on <i>our</i> behalf
To provide you with details of products and services from us and third parties that may be of interest to you in accordance with your preferences. For more information see ' <i>Marketing</i> ' below.	Consent	

## Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- health information and lifestyle information when providing intermediary services in relation to a protection insurance product; and/or
- criminal conviction or offence information when providing intermediary services in relation to a protection or general insurance product

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

## 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: 020 8991 2440

By email: [isabella@cdnlifesolutions.com](mailto:isabella@cdnlifesolutions.com)

By Post: PO Box 64411, London W5 9GT

## 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 your personal data will be kept

The following criteria are used to determine data retention periods for your personal data:

Type of Record	Retention Period
Retention in case of queries	we will retain your personal data for as long as we reasonably consider it necessary to deal with your queries (e.g. any questions you may have in relation to the services).
Retention in case of claims	we will retain your personal data for as long as we reasonably consider that you might legally bring a claim against us
Retention in accordance with legal and regulatory requirements	we will retain your personal data after we have ceased providing services to you for as long as we are required/permitted to retain it for based upon our legal and regulatory obligations.

## Transfer of your information out of the EEA

We may transfer your personal data when using the following services and they may transfer data to locations located outside the European Economic Area (EEA).

Service	Country	Stated data protection by service provider
Cloud storage for files and records	Switzerland	The company is organised and based under the laws of Switzerland, having affiliates within the territory of the EEA (Hungary). Switzerland was already granted a data protection adequacy status by the European Commission. Being located in the EEA means that the transfer of personal data to Switzerland is practically considered as intra-EU transmission of data. Personal data is primarily stored within the EEA. Personal data may also be transferred to countries outside of the EU. All such transfers of personal data are and will be made in accordance with applicable laws.
Compliance support services	India	India does not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that India provides an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of personal data will be subject to a European Commission approved contract designed to help safeguard privacy rights and give remedies in the unlikely event of a misuse of personal data.  If they transfer data to their suppliers and sub-contractors outside of the EEA, they will make sure that it is protected in a similar way as if it was being used in the EEA.
Fund research	May be transferred to, and stored at, a destination outside the European Economic Area ("EEA").	All necessary steps are taken to ensure that data is treated securely in accordance with the General Data Protection Regulations.

Protection product research	May transfer data outside the European Economic Area (EEA).	Whenever personal data is transferred out of the EEA, will always ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented: - may transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (they are subject to a "finding of adequacy") or - to countries which are subject to a finding of adequacy, see European Commission: Adequacy of the protection of personal data in non-EU countries
Report writing	May be transferred to, and stored at, a destination outside the European Economic Area ("EEA")	All steps reasonably necessary are taken to ensure that data is treated securely. Personal data will only be transferred to a country or organisation that provides an adequate level of protection. For example, where the European Commission has determined that a country provides an adequate level of protection, or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission ("EU Model Clauses"), or where the organisation has other appropriate safeguards in place such as the EU-US Privacy Shield or Binding Corporate Rules.
Risk profiling	To facilitate global operations may process, transfer, store and access Personal Data from around the world, including Canada, the United States and Australia	Where personal data is transferred outside the EEA to a country not determined by the European Commission as providing an adequate level of protection for Personal Data, steps are taken to ensure all Personal Data is provided with adequate protection and that all transfers of Personal Data outside the EEA, Canada and Australia are done lawfully.

Such countries do not have the same data protection laws as the United Kingdom and EEA.

Whilst the European Commission has not given a formal decision that the countries used provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, it is believed that the service providers we use will *ensure that* appropriate or suitable relevant safeguards are in place *that are designed* to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

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 understand how we protect information transferred outside Europe
- To find out more about how we use personal data

We may 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.

### To contest decisions based on automatic decision making

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

### To obtain a copy of our safety measures for transfers outside of Europe

You can ask for a copy of, or reference to, the safeguards we have put in place when your personal data is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.

### 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 [isabella@cdnlifesolutions.com](mailto:isabella@cdnlifesolutions.com) or write to Isabella Williams, CDN Life Solutions, PO Box 64411, London W5 9GT;
- 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](http://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 Isabella Williams if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact Isabella Williams, please send an email to [isabella@cdnlifesolutions.com](mailto:isabella@cdnlifesolutions.com) or write to Isabella Williams, CDN Life Solutions, PO Box 64411, London W5 9GT.

## Glossary of Terms

we, us or our	Chris Newcombe trading as CDN Life Solutions an individual whose business addresses are PO Box 64411, London W5 9GT and 6 Pearce Gardens, Poole BH14 8EB
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 <i>intermediary services</i>
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
financial information	this is information relating to your financial status, including salary/income, outgoings/expense, 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 be able to deliver lifelong financial and investment planning advice
lenders	a mortgage lender (for a list of current lenders which we work with, please contact us – see <i>How to contact us</i> above)
lifestyle information	this includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits
product	this is an investment, pension, protection and/or general insurance product in respect of which we provide <i>intermediary services</i> 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 <i>How to contact us</i> 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)