



PRIVACY POLICY

Michael Robinson Associates Limited is committed to protecting your personal information. This policy explains when and why we collect personal information, how we treat information obtained by us and the types of organisations to which we disclose your information, either from your use of this website or through the delivery of our services to you.

Michael Robinson Associates Limited is the data controller and is responsible for your personal data (in this privacy notice collectively referred to as "Michael Robinson Associates Limited", "we", "us" or "our".)

We may make changes to this privacy policy. We will publish the latest version of this policy on our website. This version was updated May 2018.

Any personal information you supply to Michael Robinson Associates Limited will be treated in accordance with the Data Protection Act 1998. This website is not intended for children.

During the course of Michael Robinson Associates Limited providing our services, or in the case that a child has their own investment (e.g. Junior ISA) we may collect data about children. This data will be provided by the parent or guardian and will not be used for any other purpose.

Although our website may contain links to other sites, these are outside of our control and are not therefore covered by this privacy policy. You can find further details relating to this in the Michael Robinson Associates Limited ['site disclaimer'](#) document.

The term 'GDPR' – [General Data Protection Regulation](#)

You may have heard the term 'GDPR' - many principles of GDPR are similar to those of the current Data Protection Act, with new elements and enhancements. These new rules are designed to create a uniform level of data protection throughout the EU and to give you better control of your personal data.

Personal data

Personal data is any information that enables a person to be directly or indirectly identified. For example an email address or telephone number. Any reference to personal data includes a reference to "sensitive personal data".

Sensitive data

Sensitive data is information which, due to its nature, is relevant to the fundamental rights and freedoms of an individual. For example racial or ethnic origins, health, sex life or sexual orientation.

More information regarding GDPR and data can be found here <https://ico.org.uk/>

The information we collect about you

We collect information about you when you engage with us in relation to the service we provide to you and that is necessary for the provisions of our services, this may also include:

- Information about who you are e.g. your name, date of birth and contact details
- Information connected to your product or service with us e.g. your bank account details
- Information about your contact with us e.g. meetings, phone calls, emails / letters
- Information if you visit our offices e.g. visual images collected via closed circuit television (CCTV)
- Information classified as 'sensitive' personal information e.g. relating to your health, marital or civil partnership status. This information will only be collected and used where it's needed to provide the product or service you have requested or to comply with our legal obligations

- Information you may provide us about other people e.g. joint applicants or beneficiaries for products you have with us
- Information on children e.g. where a child is named as a beneficiary on the policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender)

Processing your information

To assist us in the processing of your information we may use other companies who work under contract with us. The majority of your information is processed in the UK and European Economic Area (EEA). However, some of your information may be processed by us or the third parties we work with outside of the EEA.

The information we collect about you and how we collect it

We may collect your personal information directly from you, from a variety of sources, including:

- an application form for a product or service
- phone conversations with us
- emails or letters you send to us
- meetings with us
- participating in research surveys to help us understand you better and improve our products and services

What your information will be used for

The personal information we hold about you will be held on computer and/or paper files and this information will be disclosed to third parties for the purposes of providing our services to you, including:

- insurance companies, investment houses and associated companies and actuaries for the purpose of processing your applications

- our regulator, the Financial Conduct Authority, who has a legal authority to check all our records
- our compliance consultants who help us to ensure that we abide by our regulations
- other professional advisers such as accountants and solicitors who may have referred you to our practice or to whom we may wish to refer you for specialist advice when we consider that it would be in your best interest to do so.

We will use your personal data to provide our services to you. The legal basis for such processing is:

- To perform our contractual obligations to you
- To comply with legal obligations (e.g. anti-money laundering and pursuant to our obligations to our regulator)
- Because it is necessary for our 'legitimate interests' (e.g. keeping our records up to date)

Where third parties are involved in processing your data we will have a contract in place with them to ensure 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 will only act in accordance with our instructions.

If it is necessary for your personal data to be sent to a third party we will use appropriate and secure methods to do so.

If you do not wish us to collect and use your personal information in these ways, it may mean we will be unable to provide you our services to you.

How long do you hold personal information about me?

In principle, your personal data should not be held for longer than is necessary. We are subject to regulatory requirements to retain data for a specified minimum period. We also reserve the right to retain data indefinitely in case we need to refer to this information, even after you are no longer a client.

Accessing your information

Please contact us directly if you wish to request a copy of the information we hold about you.

It is important to us to ensure that personal information held about you is accurate and up to date. You may, and we would encourage you to, ask us to correct information about you that you think is inaccurate.

You have the right to object to our processing of any aspect of your personal data and to request its erasure should you believe that we have no legal right to continue processing.

Subject to certain exceptions, you are entitled to have access to your personal and sensitive information held by us. We may refuse such requests and we will inform you of this decision and why.

We will also keep records of events that have taken place. You may request to see your records at any time, and for us to update your record if you do not believe it accurately reflects what happened, what was discussed or agreed. You may ask us to correct or remove (where justified) any inaccurate information.

You have the right to request deletion of your personal data. We will endeavour to comply with your request subject to the restrictions of our regulatory obligations and legitimate interests.

Data security

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instruction and are subject to a duty of confidence.

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

Sending you information about our products and services

We would like to send your information about our products, services, events and news. You will be asked to sign a consent form in order for us to send you this information.

If at any time you no longer want us to stay in touch with you please contact us:

In writing: The Data Protection Officer at Michael Robinson Associates Limited, Bagshot House, 37-39 High Street, Bagshot, Surrey, GU19 5AF.

Telephone: 01276 453100

Email: enquiries@mra-financial.co.uk

You can also stop email communication at any time by simply clicking on the 'unsubscribe' button contained within all emails we send.

Complaints regarding your data

If you wish to raise a concern or have any complaint about the way we are handling your data please get in touch with us:

The Data Protection Officer, Michael Robinson Associates Limited, Bagshot House, 37-39 High Street, Bagshot, Surrey, GU19 5AF.

Telephone: 01276 453100

Email: enquiries@mra-financial.co.uk

For your further protection and in the event you cannot settle your complaint with us, you may be entitled to refer it to the Information Commissioners Office ('ICO').

Full details about the ICO can be found on its website ico.org.uk. or you can write to them at:

Information Commissioners office, Wycliffe House, Water lane, Wilmslow, Cheshire, SK9 5AF

Updates to this privacy policy

Michael Robinson Associates Limited will amend this privacy policy from time to time. We recommend you check and read this policy regularly. If you have any questions regarding this policy, please [contact us](#).