



## Privacy Policy

Effective 25 May 2018

We value your trust in us to use, store and share your information. In this policy, we explain how we collect personal information about you, how we use it and how you can interact with us about it.

### 1. Who we are

Hedley and Company Stockbrokers Limited is authorised and regulated by the Financial Conduct Authority, firm reference 471207. Our registered office is 19 Trident Park, Blackburn, BB1 3NU. Registered in England and Wales, company number 06355300.

### 2. How we collect information about you

We collect personal information from you, for example when you open an account, apply for products and services, complete transactions, look for advice or if you are an employee of the company. We will record phone conversations which may be used for training and monitoring purposes.

Our websites use 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit our website. They help us make the sites work better for you.

When you apply to us for products and services, and during the time you use these, we carry out information searches and verify your identity. We do this by sending and receiving information about you to and from third parties including credit reference agencies. We and these agencies may keep records of our searches whether or not the product or service goes ahead.

Further details regarding how your personal information is handled and stored by the credit reference agency we use can be found at the following address: <https://www.callcredit.co.uk/legal-information/bureau-privacy-policy>

### 3. How we keep your information safe

We protect your information with security measures under the laws that apply and we meet international standards. We keep our computers, files and buildings secure. When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information

### 4. How long we keep your information

To meet our legal and regulatory obligations, we hold your information while you are a customer and for a period of time after that. We do not hold it for longer than necessary.

### 5. Meeting our legal and regulatory obligations

To use your information lawfully, we rely on one or more of the following legal bases:

- performance of a contract;
- legal obligation;

- protecting the vital interests of you or others;
- public interest;
- our legitimate interests; and
- your consent.

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks, and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our products and services.

## **6. Consent**

Sometimes we need your consent to use your personal information. With direct marketing for example, we need your consent to make you aware of products and services which may be of interest to you. We may do this by phone, post or email.

You can decide how much direct marketing you want to accept when you apply for new products and services.

If we ever contact you to get your feedback on ways to improve our products and services, you have the choice to opt out.

When we use sensitive personal information about you we ask for your consent. Before you give your consent, we tell you what information we collect and what we use it for. You can remove your consent at any time by contacting us.

## **7. How we use your information**

We use information about you to:

- provide relevant products and services;
- identify ways we can improve our products and services;
- maintain and monitor your products and services;
- protect both our interests;
- meet our legal and regulatory obligations; and
- decide and recommend how our products and services might be suitable for you.

To provide our products and services under the terms and conditions we agree between us, we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our products and services.

## **8. Your information and third parties**

Sometimes we share your information with third parties.

For example to:

- provide products, services and information;
- analyse information;
- research your experiences dealing with us;
- prevent financial crime;
- help trace, investigate and recover funds on your behalf;
- trace information; and
- protect both our interests.

We expect these third parties to have the same levels of information protection that we have. We also have to share information with third parties to meet any applicable law, regulation or lawful request. When we believe we have been given false or misleading information, or we suspect criminal activity we must record this and tell law enforcement agencies, which may be either in or outside the UK.

## 9. International transfers of data

We may transfer your personal information outside of the European Economic Area (EEA) to help us provide your products and services. We expect the same standard of data protection is applied outside of the EEA to these transfers and the use of the information, to ensure your rights are protected.

## 10. Your personal information rights

You can exercise your rights by contacting us in writing at 19 Trident Park, Blackburn, BB1 3NU, by phone on 01254 699333 or by email at [compliance@hedleyandco.co.uk](mailto:compliance@hedleyandco.co.uk), or by visiting one of our offices.

**Accessing your personal information** - you can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information.

**Updating and correcting your personal information** – where you notify us of an error or omission in your personal information we will ensure that this is rectified promptly.

**Removing consent** - you can change your mind wherever you give us your consent, such as for direct marketing, or using your sensitive information, such as medical or biometric data.

**Restricting and objecting** - you may have the right to restrict or object to us using your personal information or using automated decision making.

**Deleting your information (your right to be forgotten)** - you may ask us to delete your personal information.

**Moving your information (your right to portability)** - where possible we can share a digital copy of your information directly with you or another organisation.

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information. We generally do not charge you when you contact us to ask about your information.

## 11. Making a complaint

If you have a complaint about the use of your personal information, please let us know. This will give us the opportunity to put things right as quickly as possible. If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated. You can register a complaint by phone, by email or in person at our offices. We ask that you supply as much information as possible to help our staff resolve your complaint quickly.

You can also contact the Information Commissioners Office at <https://ico.org.uk>

## 12. Updates to this policy

We will make changes to this policy from time to time, particularly when we change how we use your information, and change our technology and products. You can always find an up-to-date version of this policy on our website at [www.hedleyandco.co.uk/publications](http://www.hedleyandco.co.uk/publications) or you can ask us for a copy.