

# PRIVACY POLICY

## Data Protection, Privacy Policy and Cookie Policy

Thank you for taking the time to visit our website. David Dougan Financial Services Ltd respects each person's privacy and this policy will advise you how we collect and use the personal information that you supply us with. By submitting your data to us, it is implied that you have given us your permission to use your data under the terms of this policy. Our Privacy Policy is updated from time to time, so please check our website regularly to ensure you are fully up-to-date with how we deal with the information you have provided to us.

**Why we need your details:** David Dougan Financial Services Ltd collects and uses your personal details, which can include telephone numbers, address and e-mail, so that we can process one or more of the following:

- Provide you with financial advice
- Reply to any requests for information that you ask us for
- Clarify any particular query.
- Supply details of any product or service within the David Dougan Financial Services Ltd group only that we believe may meet your needs
- Cross check any information that we receive with that held on our database.

**How we receive the information:** The information that we hold may be supplied by you directly to us by telephone, face to face meeting or e-mail. We class this as being 'personally identifiable information', which means it can be used to identify you, personally.

**Who has access to this information?** Your 'personally identifiable information' details will be kept within the David Dougan Financial Services Ltd organisation until such time as we decide that they should be removed. Your details will **not** be sold or otherwise disposed of to any third party.

## Legal grounds for processing your information

We will rely on the following legal bases under European Data Protection Legislation for processing your personal data:

- Performance of, or entry into, a contract. The personal data that we are required to collect in order to comply with any other professional and regulatory obligations which apply to us must be provided to us in order for us to perform this contract – we would not be able to act for you without this personal data.
- Compliance with a legal obligation to which we are subject.
- We have a legitimate interest in doing so as a financial services provider (and where our legitimate interests are not overridden by your (or the relevant individual's) own interests or fundamental rights or freedoms). These legitimate interests will include our interests in managing our relationship with our clients, administering visits to our offices and ascertaining achievement of proper standards/ compliance with policies, practices or procedures.
- Where processing of 'special category data' is necessary in the context of the establishment, exercise or defence of claims.

## Sharing your information

We may share your details with carefully selected third parties. These may include service providers, support services and organisations that help us to market our services and third parties instructed to enable us to fulfil our contractual obligations to you and/or our clients in the course of business.

If we share your information with third parties, they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal data. We will only share your personal data in compliance with the European Data Protection Legislation.

We may disclose your information to third parties when:

- you specifically request this, or it is necessary to provide our financial services to you (e.g. when we need to instruct experts in another jurisdiction to provide advice which you have requested)

The third parties include:

- our preferred Product Providers & Investment Houses (including as permitted by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 which, for the purposes of preventing money laundering or terrorist financing, may require us to disclose your personal data)
- our insurers
- our auditors, including external accreditation bodies
- other professional advisors or third parties (including accountants & technical experts) with whom we engage as part of our work for our clients or who our clients separately engage in the same context
- our Regulator, the Financial Conduct Authority (FCA)
- our data processors providing catering, security, email security, data governance, archiving and other IT and business support services
- our email marketing platform provider and our website platform provider
- analytics and search engine providers that assist us in the improvement and optimisation of our website
- any third party you ask us to share your data with.

**Use of cookies on our website:** A cookie is a small text file that is downloaded onto your computer when you visit certain websites and allows a website to recognise a user's computer. Cookies are used to help users navigate websites more efficiently and to perform certain functions, as well as to provide information to the owners of the website.

**Google Analytics:** This website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of our website and compile reports for us on activity of our website.

**How do I restrict or delete cookies?** The cookies we use are essential for parts of the website to operate, some may have already been set. You may delete and block all cookies from this website, but please be aware that restricting or deleting cookies may impact on the functionality of the website. Your web browser may allow you to restrict or delete cookies set by this website. The Help function within your browser should tell you how. Alternatively, you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org) which provides general information about cookies and how you can manage cookies on your computer.

**How Secure are your details?** When you register your details, we will take all reasonable steps to keep these details secure and free from unauthorised access by use of technology and internal systems which will be updated as new technology becomes available and is appropriate to our systems.

**Third Party Sites:** Third party internet sites that you may, from time to time, link through to from our website will not be covered by our Privacy Policy and David Dougan Financial Services Ltd accept no responsibility or liability for any actions that these sites may perform. We advise that you should check the policy of each site that you visit.

**Removing or changing your information:** If you wish to change the information that we hold for you, please contact us.

If you wish to have your information removed from our database either permanently or temporarily, please contact us. Due to our Regulatory obligations & legal responsibilities, there will be occasions where we are unable to delete records. We will discuss this with all clients who request any data to be deleted.

**Making a complaint about the way in which your data is stored or used:** In the unlikely event that you have a complaint about the way in which your details are used or stored by this company, please contact: Mr David Dougan, David Dougan Financial Services Ltd, Barncluith Business Centre, Townhead Street, Hamilton, ML3 7DP.

If you simply have a query about any aspect of this policy or wish to have any part of it clarified, please do not hesitate to contact us.