

Privacy Notice

Company Statement

This privacy notice tells you what to expect when Allan Reece Associates LLP collects personal information

Who we are:

We are Allan Reece Associates LLP, we are registered with the Information Commissioner's Office.

- **ICO Registration Number:** ZA332223
- **Data Protection Officer (DPO):** Richard Reece
- **Telephone Number:** 0203 935 7999
- **Email:** info@arallp.co.uk

Our legal grounds for holding your data:

The UK's data protection laws allow us to use your personal data, provided we have a lawful basis to do so. This includes sharing it in certain circumstances, as described below.

We consider we have the following reasons (legal bases) to use your personal data:

- **Performance of contract with you:** we need to use your personal data to be able to successfully legally contract with you.
- **Compliance with our legal obligations:** we need to use your personal data so as to comply with certain legislation such as financial crime legislation.
- **Legitimate interests:** these are our business and commercial reasons for using your data, which we have balanced against your interests. We have certain legitimate interests in using your data which are not outweighed by your interests, fundamental rights or freedoms. These legitimate interests are to help prevent and detect financial crime, fraud and money laundering, to promote responsible lending and to assist our compliance with the legal and regulatory requirements placed upon us.
- **Your consent:** You can withdraw this consent at any time, in which case we will cease to use it, unless we have a right and a need to continue processing it for one of the other reasons set out above.

More information on how we use your personal data and for what purposes is set out below.

What data do we collect?

Data provided by you:

- **Lender Application Details:** For example but not limited to, your name, National Insurance number, postal address, your email address, your IP address, telephone numbers, date of birth, bank account details, equipment requirement details, home ownership details, reason for borrowing, your assets and liabilities, details of your proof of identity documentation, proof of address documentation, evidence of additional equity available and evidence of any other business interests.
- **When you talk to us:** for example on the phone, or in person including call recordings and voice messages. We may monitor or record calls with you to check we have carried out your instructions, to resolve queries or disputes, to improve the quality of our service or for regulatory or fraud prevention purposes.
- **In writing:** for example letters, emails, texts and other electronic communications.
- **Online:** for example when you use our website.

Use Of Cookies By Allan Reece Associates LLP

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. These cookies are used to collect information about how visitors use our website. We use the information to compile reports and help us improve our website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, from where the visitors have come and the pages they visited. For further information, visit www.allaboutcookies.org.

People Who Contact Us Via Social Media

If you send us a private or direct message via social media, the message will be stored by our providers, Meta (Facebook, Instagram & WhatsApp), X (formerly Twitter) and LinkedIn. It will not be shared with any other organisations.

People Who E-Mail Us

Any E-Mail sent to us, including attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. E-Mail monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any E-Mail you write is within the bounds of the law.

People Who Make A Complaint To Us

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provided.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of the person's record is in dispute.

We usually have to disclose details of the complaint to our Professional Indemnity Broker and Insurer. If the complaint is concerning Data Protection, then the matter may also be referred to the Information Commissioner's Office (ICO).

We may be required to disclose a copy of our file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint case. We are also required to disclose to the Financial Conduct Authority high level analytics concerning the number and nature of complaints received. This does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for ever whilst still authorised by the FCA and whilst still retaining Professional Indemnity Insurance as this is a condition of authorisation.

People Who Use Our Services

Allan Reece Associates LLP provide a range of Financial Services to Data Subjects. We process data provided by the data subject and other sources in order to provide the service the data subject has requested and for other closely related purposes. When people subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

Use Of Data Processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period as we instruct.

Our data processors / third parties we use include: SMARTR365, Twenty7Tec, Brickflow, L&G Ignite, AirSourcing, Solution Builder, Microsoft Regulatory and Compliance opinion where required: Wycliffe Compliance Services

Crime, Sanctions and PEP checking: National Crime Agency / UK Sanctions List / Fact Finding re PEP

Back Office Systems: Smarttr365, Twenty7Tec, Brickflow, L&G Ignite, AirSourcing, Solution Builder, Microsoft

Data Protection Officer (DPO): Richard Reece – Tel no: 0203 935 7999 – E-Mail: richard@arallp.co.uk

Your Rights

Under the UK General Data Protection Regulations and Data Protection Act 2018, you have rights as an individual which you can exercise in relation to the information we hold about you.

Access To Personal Information (Portability)

Data Subjects may submit a Subject Access Request (SAR) in order to obtain a copy of the personal data we hold about them in a structured and portable manner, so it can be used for their own purposes across different services. All SARs should be sent to the DPO as above.

Confirmation Of Whether, And Where, The Controller Is Processing Their Personal Data

Allan Reece Associates LLP is the Data Controller and a processor. Allan Reece Associates LLP undertakes data processing in the UK.

Right In Relation To Automated Decision-Making & Profiling

This allows Data Subjects 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.

Right Of Data Subjects To Erasure (Right To Be Forgotten)

Data subjects may notify the Firm if they wish to exercise their right to erasure. Such a withdrawal of Consent does not Affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact. Allan Reece Associates LLP, however, may retain a copy of any personal data by the Controller that may be necessary for the establishment, exercise or defence of any future legal claims.

Right Of Rectification

Allan Reece Associates LLP will seek to ensure that inaccurate or incomplete data will be rectified. Data Subjects have the right of rectification.

Right To Object To Processing For The Purposes Of Direct Marketing

Data Subjects may notify the Firm, at any time, if they wish to exercise their right to be removed from any Direct Marketing activities. The firm may still contact the Data Subject in order to fulfil any contractual obligations concerning the policies and services provided.

Changes To This Privacy Notice

We will keep our privacy notice under regular review. The date of the version and number will appear and the foot of the page.

How To Contact Us

If you want to request any information about our Privacy Policy, you can email us or write to:

FAO The Data Protection Officer
Allan Reece Associates LLP
Capital House
Appleton way
Hornchurch
RM12 4XY
E-Mail: info@arallp.co.uk

How to make a complaint and contact the appropriate authority

If you are unhappy about how your personal data has been used by us, please contact us and we will be happy to register a complaint.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data. You can contact them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, on 0303 123 1113 or by email to casework@ico.org.uk. See also <https://ico.org.uk/global/contact-us/>.