



Privacy Policy

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 & Co Stockbrokers & Wealth Managers is a trading name of Hedley & Company Stockbrokers Limited who are Authorised and Regulated by the Financial Conduct Authority under reference 471207. Also they are a private limited company registered in England and Wales under number 06355300. They are registered with the Information Commissioner's Office (ICO) under reference Z1268192 as a data controller of your personal information.

2. How we collect your personal data

We collect personal information from you in a variety of ways.

- Such as when you complete our client agreement
- Or send us a letter or email
- Speak to us using the telephone or mobile devices or in person
- Third parties, such as your IFA, your accountant, pension trustees or a relative
- Public records, for example where we verify your address or corporate entity using companies house or social media

3. Examples (not limited to) of information we may collect from you;

- Personal details such as your title, name, date of birth, residential and employment status
- Financial information, such as your bank account details, income and expenditure, your financial objectives and attitude to risk
- We ask about your knowledge and experience in using certain financial products
- Records of all correspondence with you, including any telephone call recordings
- Health information, only for the purposes of assisting us in ensuring your investments remain suitable for you.

Please note information about your health is regarded as a special category of personal data, if you volunteer this information you will be regarded as giving your explicit consent to us processing it.

If you do not provide certain information to us this may limit our ability to offer certain services to you

4. Why do we collect your personal information and on what lawful grounds

We collect and use your personal data to provide our services and to ensure we meet our regulatory requirements. Your data may also be used for marketing purposes so that we can inform you about our products and services.

The lawful basis that we rely upon is that it is necessary for the performance of our contract with you and that we have obtained your consent to do so.

Also we may have a legal obligation to hold your data such as the need to establish, exercise or defend our legal rights

Another reason is our legitimate business interests, such as outsourcing our back office functions to third parties

Please note you may opt out of receiving marketing communication from us by simply emailing us at compliance@hedleyandco.co.uk

5. How long we keep your information for

To meet our legal and regulatory obligations, we hold your information while you are a customer.

After 5 years of your account moving to a nil value and we have had no contact with you we will delete all written information, such as client agreements and correspondence.

Please note the following points;

- The basic information that is held by our back office provider held electronically such as your name and address and transactions entered into, will be held indefinitely
- The 5 year rule does not apply to accounts that are connected to a pension, these are held indefinitely to allow us to meet certain regulatory obligations
- We will keep your data beyond the 5 years if we are required to do so because of legal proceedings
- If you wish to become a customer again and use our services after the 5 years (or before in certain circumstances) you will be required to complete our account opening forms and provide identification documents.

6. How do we store your personal data?

All information you provide to us is stored on access controlled secure servers within the UK. All paper documents containing your personal data that are retained are held on our premises in a secure manner with only staff members having access.

7. Who will we share your information with?

In providing our services to you it may be necessary for us to disclose your personal information to certain third parties.

- Regulatory Bodies, such as FCA and HMRC (or overseas equivalents)
- Stock Exchanges, such as the LSE (or overseas equivalents)

The following third parties who provide fundamental services to us;

Platform Securities LLP – they provide back office support and act as custodian for assets you hold. We will be happy to provide you with their privacy notice upon request

Connect Systems Limited – they provide us with IT support
We will be happy to provide you with their privacy notice upon request

There may be other third parties who provide minor services to us, we will ensure that appropriate data processing agreements are in place.

We will not sell or lend your information to third parties

As mentioned above there may be overseas equivalents that we may need to share your personal information with meaning your data may be transferred outside of the UK. Where we do so, we will ensure that we do this in accordance with current data protection legislation and only where it is necessary to provide our services to you or to meet regulatory obligations

8. What are your data protection rights?

You have certain rights in relation to your personal data, not all rights apply in all cases and these are explained in more detail below;

Accessing your personal information - you can ask us for a copy of the personal information we hold by making a subject access request (SAR)

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.

Deleting your information (your right to erasure) – you may ask us to delete your personal information. We will delete your personal data if we no longer need it for the reasons we told you

Right to object and restrict processing – you can object or request we restrict the processing of the information we hold about you, however under certain circumstances we may be legally required to continue to process your data and would have to refuse your request

Right to data 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.

9. Automated decision making

We will not use your personal data for the purposes of automated decision making.

10. Cookies Policy

It is common practice for almost all professional web-sites to use cookies. Cookies are files created by web-sites you visit. They make your on-line experience easier by saving browsing information.

We currently do not use cookies on our web-site except for the use of google analytics to analyse information about our web-site.

Google Analytics gathers information about the use of our web-site and creates reports generally advising us of how many visitors we have had to our web-site.

For more information about Google Analytics please visit their web-site.

You can disable cookies by adjusting the setting on your browser. Please be aware that disabling cookies will affect the functionality of this and many other web-sites you visit.

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, the last update was in October 2022. We reserve the right to update this privacy notice at any time and we will advise you when we make any substantial update to it.

13. How to contact us

If you have any questions about our privacy notice or the information we hold about you, please contact us

compliance@hedleyandco.co.uk

Data Protection Officer
Hedley & Co Ltd
19 Trident Park
Blackburn
BB1 3NU