

VINTAGE

Chartered Financial Planners

Our Website User
PRIVACY POLICY



BACKGROUND

Vintage, Chartered Financial Planners understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.vintage-fp.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when using our website. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. DEFINITIONS & INTERPRETATIONS

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out below;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means Vintage, Chartered Financial Planners whose registered and trading address is Ground Floor, 1 Lockheed Court, Stockton-on-Tees, TS18 3SH.

2. ABOUT US

- 2.1 Our Site is owned and operated by Vintage, Chartered Financial Planners whose registered and trading address is Ground Floor, 1 Lockheed Court, Stockton-on-Tees, TS18 3SH.
- 2.2 Our VAT number is 180 3963 00 and our ICO registration number is Z5651519.
- 2.3 Our Data Protection Contact can be contacted by email at privacy@vintage-fp.com by telephone on 01642 525050 or by post at Vintage, Chartered Financial Planners whose registered and trading address is Ground Floor, 1 Lockheed Court, Stockton-on-Tees, TS18 3SH
- 2.4 We are authorised and regulated by the Financial Conduct Authority

3. WHAT DOES OUR POLICY COVER?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. YOUR RIGHTS

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to Us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. WHAT DATA DO WE COLLECT

Depending upon your use of Our Site, We may collect some or all of the following personal [and non-personal] data (please also see section 13 on Our use of Cookies and similar technologies and Our Cookie Policy:

- 5.1 name;
- 5.2 business/company name
- 5.3 contact information such as email addresses and telephone numbers;
- 5.4 IP address;
- 5.5 web browser type and version;
- 5.6 operating system and device(s);
- 5.7 usage of the website and clicks, highlights or hovers made on our page(s);

6. HOW DO WE USE YOUR DATA?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
- 6.2.1 Replying to emails from you;
 - 6.2.2 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by contacting us via privacy@vintage-fp.com or calling 01642 525050).
 - 6.2.3 Market research;
 - 6.2.4 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
 - 6.2.5 To help understand how our site content is displayed and interacted with by your usage.
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone text message or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties including Medium, Facebook Pixel, Google Analytics, FullStory, Heap and Wordpress whose content appears on Our Site may use third party Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 6.6.1 Any identifiable information for non-clients is retained for a period of 5 years from the date of your last visit to our website.
 - 6.6.1.1 Data after 1 year will then be stripped of any identifiable information for a period of a further 5 years, an example of this is "1 visitor who viewed 15 pages from an iPad in England on a particular day".
 - 6.6.1.2 For clients, your information is retained as per our Privacy Notice which was supplied in your welcome pack.

7. HOW AND WHERE WE STORE YOUR DATA

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Y our data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

8. DO WE SHARE YOUR DATA?

- 8.2 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. Data will only be shared and used within the bounds of the law.
- 8.4 We may sometimes use third party data processors that are located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:
- 8.4.1 Data passed to the United States for processing is done so only using companies that abide by the EU/US Privacy Shield arrangement. More information about this can be found at <https://www.privacyshield.gov>
- 8.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. HOW CAN YOU CONTROL YOUR

- 9.1 When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details.
- 9.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. YOUR RIGHT TO WITHHOLD INFORMATION

- 11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict Our use of Cookies. For more information, see Our Cookie Policy.

11. HOW CAN YOU ACCESS YOUR DATA?

- 11.1 Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at privacy@vintage-fp.com, or using the contact details below.

12. CONTACTING US

- 12.1 If you have any questions about Our Site or this Privacy Policy, please contact Us by email at privacy@vintage-fp.com, by telephone on 1642 525050, or by post at Vinatge, Chartered Financial Planners, Ground Floor, 1 Lockheed Court, Preston Farm, Stockton-on-Tees, TS18 3SH. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

13. CHANGES TO OUR POLICY

- 13.1 We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.