# Data Handling Policy

Version: 26/11/2026

This Data Handling Policy explains how **Eastmills Limited** ("we", "us") collects, uses, stores, and shares your personal information, and sets out your rights under UK data protection law (UK GDPR and the Data Protection Act 2018).

### How to Contact Us

If you have any questions about this policy or would like to use any of your data protection rights, please get in touch:

- **Post:** Eastmills Limited, MCF Complex, 60 New Road, Kidderminster, Worcestershire, DY10 1AQ
- **Telephone:** 01562 865 085
- **Email:** info@eastmillsltd.co.uk

## What Information We Collect and Why

### To Give You Financial Advice and Ongoing Service

We collect and use the following personal information to plan, advise on, set up, and manage your financial arrangements:

- Names, contact details, and addresses
- Date of birth and National Insurance number
- Family, employment, and financial circumstances
- Account, investment, pension, and policy history
- Bank and payment details (for transfers, contributions, direct debits, or fee payments)
- Identification and anti-money laundering (AML) verification documents
- Credit reference and AML screening checks
- Notes of meetings, advice, correspondence, and decisions
- Call recordings (where applicable)
- Details of any compliments, queries, or complaints

### Extra Care for Sensitive Information (Special Category Data)

Some information is more sensitive and receives extra legal protection. We only collect it where needed:

- **Health information**: where needed to assess suitability, arrange protection or annuity products (underwriting), or record and support vulnerability or accessibility needs.
- **Religious or philosophical beliefs**: only where you choose to share this with us, for example to reflect ethical, faith-based, or Sharia-compliant investment preferences.

### To Meet Legal and Regulatory Requirements

We collect and use the following information to meet our legal and Financial Conduct Authority (FCA) obligations (such as AML checks, advice records, and regulatory reporting):

- Name and contact details
- Identification and AML verification documents
- Financial and transaction records
- Any other information required by law or our regulator

### To Handle Queries, Complaints, or Claims

- Names, contact details, and address
- Account, policy, and service history
- Payment and financial transaction records
- Advice records and correspondence

## Our Legal Reasons for Using Your Information

Under UK GDPR, we must have a valid legal reason ("lawful basis" under Article 6) for collecting and using your personal information. The legal reason we rely on can affect which data rights apply.

### Providing Financial Advice and Services

- **Contract**: we need your information to set up and deliver the services in our Client Agreement.
- **Legal obligation**: we must collect and use certain information to follow FCA rules, AML laws, and other legal duties.

- **Legitimate interests**: where needed to run our business smoothly and securely (such as keeping accurate client records, maintaining IT security, and keeping you informed about your service), provided this does not override your rights.
- **Consent**: where we ask for your clear permission for a specific purpose. You can withdraw your consent at any time.

### Meeting Legal and Regulatory Requirements

- **Legal obligation**: needed to comply with UK law and FCA rules.

### Handling Queries, Complaints, or Claims

- **Contract**: needed to resolve matters relating to the services we provide to you.
- **Legal obligation**: needed to follow FCA complaints rules and legal duties.
- **Legitimate interests**: needed to investigate, respond to, or defend queries, complaints, or legal claims.

### Extra Legal Conditions for Sensitive Information (Article 9 UK GDPR)

When we use sensitive information (such as health details or religious/philosophical beliefs), we also rely on an extra legal condition under Article 9 of the UK GDPR:

- **Explicit consent**: your clear, specific agreement for us to use this information for the stated purpose (which you can withdraw at any time); or
- **Substantial public interest** (under Schedule 1 of the Data Protection Act 2018): where strictly necessary for advising on or arranging insurance contracts, or for supporting and safeguarding clients in vulnerable circumstances.

## Where We Get Your Information From

We collect personal information from:

- Directly from you (in meetings, forms, emails, phone calls, and letters)
- Your existing pension, investment, and insurance providers and platforms (with your permission)
- Credit reference and AML / identity verification agencies
- Employers or pension scheme administrators (where relevant to workplace pensions or benefits)
- Your other professional advisers, such as accountants or solicitors (where you have authorised us to speak with them)

## Who We Share Your Information With

We only share your personal information where needed to provide our services, keep our business secure, or meet legal and regulatory duties. This includes:

- Investment platforms, pension providers, and product providers
- Insurance companies
- Discretionary Investment Managers (DIMs) appointed on your behalf
- AML / identity verification and credit reference agencies
- Compliance consultants, external auditors, or inspectors
- IT, CRM, document management, and secure cloud software providers who process data on our behalf
- Your authorised professional advisers (such as solicitors or accountants)
- Financial or fraud investigation authorities
- Regulators and dispute resolution bodies (including the FCA, FSCS, and Financial Ombudsman Service)
- Any other organisations we are legally required to share information with

### If Your Data Is Stored Outside the UK

We mainly store and process your personal information in the UK. If any of our secure IT, CRM, or cloud software providers store or process data outside the UK, we make sure it has the same level of protection required under UK data protection law (such as UK adequacy regulations or the UK International Data Transfer Agreement (IDTA)).

## How Long We Keep Your Information

We only keep your personal information for as long as needed to provide our services and meet our legal and regulatory duties:

- If you become a client, we keep your records for at least **6 years** after our service to you ends.
- Certain records (including advice on **pension transfers, pension opt-outs, and Free-Standing Additional Voluntary Contributions (FSAVCs)**) are kept **indefinitely** under FCA rules.
- If you enquire about our services but do not become a client, we only keep your details for as long as reasonably needed to handle your enquiry and meet any regulatory record-keeping rules.

## Your Data Protection Rights

Under UK data protection law, you have the following rights (some exemptions may apply depending on our legal reason for holding your data):

- **Ask for a copy of your data** *(Right of access)*: request copies of your personal information and details of how we use it.
- **Ask us to correct your data** *(Right to rectification)*: ask us to fix inaccurate details or complete anything that is missing.
- **Ask us to delete your data** *(Right to erasure)*: ask us to delete your personal information in certain circumstances.
- **Ask us to pause or limit how we use your data** *(Right to restriction of processing)*: ask us to restrict how we use your information in certain circumstances.
- **Object to how we use your data** *(Right to object)*: object where we rely on legitimate interests.
- **Ask us to move your data to another firm** *(Right to data portability)*: ask us to transfer information you gave us to another organisation, or to you, in certain circumstances.
- **Withdraw your consent** *(Right to withdraw consent)*: where we rely on your consent (or explicit consent), you can withdraw it at any time.

You can read more about your rights and when exemptions apply on the Information Commissioner's Office (ICO) website at ico.org.uk/for-the-public.

To use any of these rights, please contact us using the details at the top of this policy. We will reply as quickly as we can, and always within **one month**.

## How to Make a Data Complaint

If you have any concerns about how we handle your personal information, please contact us first using the details at the top of this policy so we can put things right.

When we receive a data protection complaint, we will:

- Acknowledge your complaint promptly and within **30 days**;
- Investigate it thoroughly and take appropriate action; and
- Keep you updated on the outcome.

If you are still unhappy after raising your concern with us, you can complain to the **Information Commissioner's Office (ICO)**:

- **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Helpline:** 0303 123 1113
- **Website:** ico.org.uk/make-a-complaint