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## PRIVACY NOTICE

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### BACKGROUND:

Grosvenor Menghini Financial Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect, process and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Me

Grosvenor Menghini Financial Limited

ICO Registration number: Z7177670

Limited Company Registered in England & Wales Company No: 04557305

Registered Address: 1-2 Harbour House, Harbour Way, Shoreham-by-Sea, BN43 5HZ

E mail address: tony@mifs.co.uk

Telephone number: 07522 377491.

Postal Address: Grosvenor Menghini Financial Limited, C/O 1-2 Harbour House, Harbour Way, Shoreham-by-Sea, BN43 5HZ

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us, using the details in Part 12, to find out more or to ask any questions.
- b) The right to access the personal data we hold about you. Part 12 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or in assisting you to enter into a contract or for the performance of a contract, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office, details in Part 14, or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office, details in Part 14 below.

## 5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- concerning your identity and contact details;
- concerning your age and gender;
- relating to your financial and personal circumstances;
- relating to your health and family
- relating to your occupation and work
- concerning your financial objectives and attitude to risk

Your personal data may also be obtained by us from the following third party:

- Nexus IFA Ltd

We will record your information exactly as you provide it. You may ask us to update it at any time and we will action your request promptly and where possible notify relevant third parties (e.g. Nexus IFA Ltd) of any changes.

We will only process (i.e. record and store) sensitive personal data, such as data concerning health, in relation to your entering into, or taking steps to enter into, a contract arranged by Nexus IFA Ltd and only with your explicit and informed written consent. In such cases you will be asked to sign a separate consent form (provided by Nexus IFA Ltd) to evidence this and that you understand the purpose(s) of the processing of such data. Your consent may be withdrawn at any time.

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for us to provide our services to you (e.g. you have asked us to take specific steps regarding an existing contract or before you enter into a new contract arranged by Nexus IFA Ltd); because you have consented to our use of your personal data; or because it is in our legitimate business interests to use it.

Your personal data may be used for the following purposes:

- When acting as a client liaison between Nexus IFA Ltd and yourself.
- When communicating with you. This may include responding to emails or calls from you or contacting you to ensure that our records of your personal information are correct.
- When supplying you with information by email, by post or in person, that relates to your contracts arranged by, or enquiries to, Nexus IFA Ltd.
- To review and improve the service we offer, or to handle complaints.

If we wish to process your personal data for any other unrelated purpose than those we have informed you about, we will notify you.

## 7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. The following factors will be used to determine how long your personal data is kept by us:

- Business, legal and regulatory requirements.

## 8. **How Secure Will You Keep My Personal Data?**

We will ensure that your data which is only accessible to our authorised people in our firm and it will remain confidential at all times.

We have appropriate security measures in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information.

If we provide your personal data to another organisation (e.g. Nexus IFA Ltd) to process in relation to your entering into a contract arranged by them, we'll make sure they provide us with reassurances that they have appropriate security measures in place & treat your personal data as confidential at all times.

## 9. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

## 10. **Do You Share My Personal Data?**

We will share your personal data with Nexus IFA Ltd (who will provide you with their own Privacy Notice) as part of our client liaison role between you both. However, we will not share any of your personal data with any other third parties, for any purposes, subject to one important exception:

- In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal or regulatory obligations, a court order, or the instructions of a government authority.

## 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. To ensure a timely response to your request, please include:

- your full name and names you have been known by if relevant
- your date of birth
- your address, telephone number and email address
- the records you require

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

Please note that we have to verify your identity before the release of any information. You will need to supply a proof of address (driving licence, utility bill or an official letter dated in the last 3 months) and proof of identity (preferably photo id such as a passport or photo driving licence).

## 12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following contact details:

Email address: [tony@mifs.co.uk](mailto:tony@mifs.co.uk)

Telephone number: 07522 377491

Postal Address: Grosvenor Menghini Financial Limited, C/O 1-2 Harbour House, Harbour Way, Shoreham-by-Sea, BN43 5HZ

## 13. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be included in a new Privacy Notice available on request.

14. **How to make a complaint to the regulator?**

- By writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- By telephoning: 0303 123 1113.
- By emailing: [casework@ico.org.uk](mailto:casework@ico.org.uk)
- By using their website: <https://ico.org.uk/for-organisations/report-a-breach>