



HEATHCOTE
FINANCIAL PLANNING

Privacy Statement

Document updated: 31st August 2026

Heathcote Financial Planning (HFP) is a trading name of The Mortgage and Protection Partnership Ltd.

HFP takes the privacy and protection of personal data seriously; we therefore ask you to read the following important information which explains how we collect, store and use your personal data.

1. Who are we?

HFP is registered in England under company number 8734287 and our office address is 1 Olympus Park, Quedgeley, Gloucester GL2 4NF. HFP is authorised and regulated by the Financial Conduct Authority under Firm Reference Number 612049.

2. Introduction

Under the Data (Use and Access) Act 2025 (DUAA), UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, we are required to provide you with clear information about how your personal data is collected, used, stored and shared. This includes explaining the lawful basis on which we process your information and your rights in relation to that processing.

We process your personal data under the lawful bases of:

- Performance of a contract;
- Compliance with legal and regulatory obligations including FCA, DUAA 2025 and anti-money laundering legislation;
- Legitimate interests in delivering regulated financial advice; and
- Consent where required, including Special Category Data and Marketing.

This notice (together with our Statutory disclosures and any other documents referred to in it) ("Privacy Notice") sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us.

3. What do we mean by Personal Data?

By personal data (or personal information), we mean information that relates to you and is used to identify you, either directly or in conjunction with other material we may hold.

Some Personal Data may identify you directly, for example, your name, address, date of birth, national insurance number. Other Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of HFP providing you with advice and guidance in relation to your requirements, your Personal Data may include:

- Name, Date of Birth, Gender, Nationality, Civil/Marital Status, Contact Details, Addresses and any documents that are necessary to verify your identity
- Employment and remuneration information
- Bank account details, tax information, commitments for liabilities such as loans and credit cards, personal credit history, sources of income and expenditure
- If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially to their Special Category Data.

In addition, when you visit our sites or use our services, we may automatically collect the following information:

Technical information, including information obtained from cookies, the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, browser type and version, browser plug-in types and versions, operating system and platform.

We may also receive personal information from third parties that we work with, including:

- Companies that introduce you to us Financial Advisers
- Insurers
- Comparison websites
- Fraud prevention and/or credit reference agencies
- Payroll service providers (in relation to Auto-Enrolment Pension products)
- Public information sources such as Companies House
- Agents working on our behalf
- Market researchers
- Regulatory bodies
- Government and law enforcement agencies.

4. Digital Identity Verification (DVS)

We use approved Digital Verification Services (DVS) to confirm your identity. This involves secure digital checks of your identity documents and biometric information.

These checks help protect you from fraud and ensure we meet our legal obligations under the Data (Use and Access) Act 2025.

How Your Data Is Shared

We only share your data with regulated third parties where required by law or where necessary to deliver our services. All data sharing is carried out through secure, DUAA compliant systems.

Your Rights Under DUAA

You have the right to access, correct, restrict, or object to the processing of your data. You may withdraw consent for marketing at any time. You may also request details of any Open Finance data accessed on your behalf.

How We Use DUAA Enabled Data

We use DUAA enabled data to:

- Verify your identity
- Assess the suitability of our advice
- Meet our anti-money laundering obligations
- Monitor your financial arrangements on an ongoing basis
- Ensure we deliver good outcomes under the FCA Consumer Duty

5. What is Special Category Data?

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' such as:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health
- A person's sex life
- Sexual orientation

There are further protections in relation to Criminal Offence data which can be found at <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/>

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This relates to insurance-related activities such as underwriting, claims, and fraud management.

We will use Special Category Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice. In order to process your Special Category Data however, we do require explicit consent.

6. Why do we collect information from you?

In order to undertake our services for you, we have the right to use your Personal Data provided it is in our legitimate business interest. We may be required to share this data with third parties such as providers, Insurance Companies and Regulatory and Legal bodies etc.

We use your personal information to enable us to:

- Provide services and advice or provide you with the information, products and services you have requested from us under 'Legitimate Interest'.
- Retain records of any services or advice we provide to you in order to defend potential legal claims or complaints and to comply with our Legal and Regulatory obligations.
- Provide you with details of products and services we may feel to be of interest to you in accordance with your preferences.

7. How do we collect information?

Most information we obtain will be directly from you during our meetings and discussions, or in writing, including via email.

We may also need to obtain information from third parties in relation to verifying your identity. With regard to electronic ID checks, we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

8. How do we protect your personal information?

We have strict safeguarding processes to ensure that we meet our obligations under the Data Protection Regulations 2018. Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard your Personal Data against it being accessed unlawfully or maliciously by a third party.

We will:

- Record and store your Personal Data in our paper files and electronic files on our computer systems, which can only be accessed by our staff when it is necessary to provide our service to you and to perform any administrative tasks associated with, or incidental to, that service
- Submit your Personal Data to providers either electronically or via paper-based forms to allow us to advise you or process your application for a product, or to obtain information as required as part of our services

- Use your Personal Data to respond to any queries you have about your policies under our Agency.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of three years (mortgage/protection)/six years (pensions/investments), or in instances whereby we have a Regulatory or Legal obligation to hold such information indefinitely.

9. What are your rights surrounding your personal information?

Your enhanced rights under the GDPR and the Data (Use and Access) Act 2025 (DUAA) include:

The Right to be Informed: Organisations must provide clear, transparent, and concise information about how they use personal data, typically through a privacy notice.

The Right of Access (SARs): Individuals can request a copy of their personal data (a Subject Access Request or SAR), which must generally be provided within one month for free where this is reasonable and proportionate. In instances where this is considered to be complex or excessive, this may take up to an additional two months; however, individuals would be informed of this at the time.

The Right to Rectification: Individuals can ask to have inaccurate personal data corrected or incomplete data completed.

The Right to Erasure ("Right to be Forgotten"): Individuals can request the deletion or removal of personal data in certain circumstances, such as when it is no longer necessary.

The Right to Restrict Processing: Individuals can ask to suppress or block the processing of their data in specific scenarios, allowing for storage but not usage.

The Right to Data Portability: This allows individuals to obtain and reuse their personal data for their own purposes across different services in a secure, machine-readable format.

The Right to Object: Individuals can object to processing based on legitimate interests, direct marketing (including profiling), or research/statistics.

The Right to request details of Open Finance Data accessed: You can request access to the data we have obtained via the Open Finance system.

Rights Related to Automated Decision-Making and Profiling: Individuals have protections against decisions made solely on automated processing that produce legal or similarly significant effects.

The Right to withdraw marketing consent at any time: If you have provided consent to marketing materials, not including ongoing servicing, you can withdraw this consent at any time.

Please note that the Legal and Regulatory obligation can, in some circumstances, limit the amount of personal or special category data that can be removed from our records.

10. Who do we share your personal information with?

We will only share your personal data with third parties when it is necessary to facilitate the service you have asked us to provide, or if we are required to do so as a legal or regulatory obligation. We have contracts/safeguards in place to ensure that they comply with the GDPR and treat the privacy of your personal data with the same importance as we do.

Your Data may be transferred outside of the EEA as part of the normal processing of Data, but this will only be where necessary and where there are sufficient safeguards in place.

11. Who to contact in relation to your Personal Data?

Our Senior Responsible Individual (SRI) is a member of our senior management team and is responsible for UK data protection compliance.

If you have any questions or comments about this document, or wish to contact us in order to exercise any of your rights or notify us of an unauthorised disclosure, please contact:

SRI by email at steve@heathcotefp.co.uk, by telephone on 0333 3356087 or by writing to Heathcote Financial Planning, Olympus House, Olympus Park, Quedgeley GL2 4NF.

If we feel we have a legal right not to deal with your request, or to action it in a different way from how you have requested, we will inform you accordingly.

If you have any concerns or complaints as to how we have handled Your Personal Data, you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

By signing below, you are consenting to us retaining your data for the purposes outlined above.

By ticking this box, you are consenting to us obtaining and retaining your Special Category Data for the purposes outlined above ☐

Name	Signature	Date
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Please tick the boxes below if you give consent for us or any company associated with us to contact you for marketing purposes by e-mail, telephone, post or SMS.

Please note that marketing consent is entirely optional and does not affect the advice or services we provide.

Name	Marketing		
	Email	Phone/ SMS	Post