



EJ Financial Limited GDPR Processes

- **Information Held**
 - Contact Details: Client Name, Address, Email Address, Telephone Numbers
 - Client DOB, NINO, Portfolio References, AML documents
 - Financial Fact Find

- **Where did the information come from?**
 - Directly from the Client
 - Directly from the relevant Service Partner

- **Who do we share the information with?**
 - Contact Details are shared with the relevant Service Partner
 - AML details are shared with the relevant Service Partner

- **Communicating with Clients / Prospects**
 - Permission is requested to use Client / Prospect email addresses
 - Permission is requested to communicate via Dropbox
 - Permission is requested for Clients to share a single Dropbox folder if appropriate

- **Retention Periods**
 - Client information is retained in line with FCA Guidelines
 - Prospect information is retained until an advice decline is registered it is then deleted or a request to retain it is submitted
 - Non-client data, where permission is received, is archived into a Dropbox 'Decline' folder

- **Individuals' Rights to**
 - Be informed
 - Access
 - Rectification
 - Erasure
 - Restrict processing
 - Data portability
 - Object
 - Not be subject to automated decision-making including profiling
 - Data being in a structured commonly used and readable format

- **Access Requests**
 - We will not charge for non-excessive information requests (4 per year)
 - We will respond within 48 hours
 - We will supply the requested access information within one calendar month
 - We will refuse or charge for manifestly unfounded or excessive access requests
 - We will inform the requestor within 24 hours of a refusal or charge

- **Lawful basis for processing personal data**
 - To communicate an appointment venue, date and time
 - To provide a letter of Engagement
 - To provide a Client Advice Report
 - To communicate weekly Financial, Technical or Global Stockmarket updates

- **Consent**
 - We will always ask permission to use a prospect or client email address
 - We will always ask permission to communicate via Dropbox
 - Clients without email will always be asked what information they would like to receive via the postal system
 - We will always use an 'opt-in' / 'opt-out' process with Clients and Prospects

- **Children**
 - We will always ask parents or guardian's permission for holding data on children under the age of 16

- **Data Breaches**
 - All breaches will be notified to the person or persons concerned within 24 hours of discovery
 - If relevant, ICO will be informed immediately that a breach is detected

- **Data Protection Officers**
 - Responsibility for data protection compliance sits with the Principal, Ted Shaw Dip PFS
 - Data Protection processes will be validated by an External Compliance Company
 - Data protection is only required for UK clients, we do not deal, Internationally

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