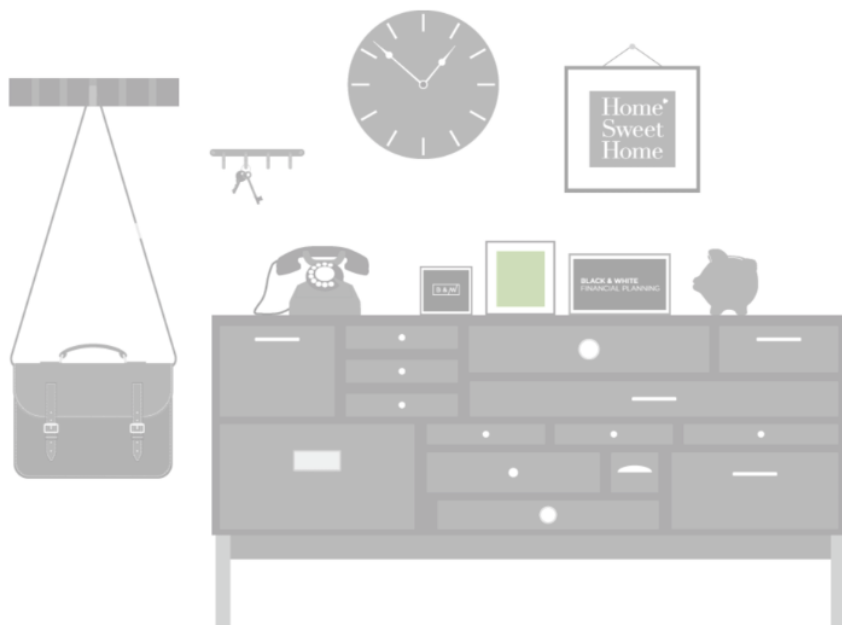


BLACK & WHITE
FINANCIAL PLANNING

Privacy Policy

Tel: 01304 448861



Black & White Financial Planning Limited is authorised and regulated by the Financial Conduct Authority

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Introduction

We are committed to protecting your privacy and handling your personal data transparently, securely, and in compliance with UK data protection law.

This Privacy Policy explains how **Black & White Financial Planning** (“we”, “us”, “our”) collects, uses, shares, and protects your personal data. It applies to:

- Visitors to our website (bwfp.co.uk)
- Prospective clients
- Existing clients receiving our services

If you have any questions, please contact us (see section 2).

Who we are, and our contact details

Black & White Financial Planning is authorised and regulated by the Financial Conduct Authority (FCA Firm Reference Number: 588625).

Our company registration number with Companies House is: 08148502

We are the **data controller** responsible for your personal data.

You can contact us at:

Address	Black & White Financial Planning Ltd Victoria House 1 Maison Dieu Road Dover CT16 1RW
Telephone	01304 448861
Email	info@bwfp.co.uk

Your personal data

The personal data we collect

We collect personal data directly from you (e.g., via forms, emails, meetings, or phone calls). In limited cases, and only with your express written authority, we may obtain information about your existing pensions, investments, or protection policies directly from product providers.

Types of personal data we may collect

- Identity and contact details (name, address, date of birth, email, telephone number)
- Financial information (income, assets, liabilities, tax position, financial objectives)
- Employment and business information
- Family circumstances and dependants
- Records of our correspondence, meetings, and advice

Special category (sensitive) data

Where necessary for certain services (e.g., protection/insurance advice or supporting vulnerable clients), we may process data about your health or vulnerability. We only do this where strictly required and in line with data protection law.

How we use your personal data and our lawful bases

We use your personal data to:

- Provide financial planning advice and related services
- Assess suitability and make recommendations
- Arrange products or services on your behalf
- Manage our client relationship and communicate with you
- Maintain records for quality, compliance, and business purposes
- Comply with legal and regulatory obligations (including FCA rules)

The lawful bases under UK GDPR that we can use your personal data are:

- **Contract** – to perform our agreement with you or take steps at your request before entering an agreement
- **Legal obligation** – to meet FCA, anti-money laundering, or other regulatory requirements
- **Legitimate interests** – for our business administration, record-keeping, and service improvements (provided these do not override your rights)

For special category data, we rely on additional conditions, including processing necessary for insurance and financial advice purposes or to meet regulatory obligations.

Automated decision-making

We use tools (such as risk-profiling and well-being questionnaires) to aid our service and to inform our advice. However, no decisions with legal or similarly significant effects are taken solely by automated means – a qualified adviser reviews all outputs.

Who we share your data with

We share personal data only where necessary to provide our services or meet legal obligations, including with:

- Product providers, insurers, investment platforms, and lenders
- Discretionary investment managers
- Professional advisers (e.g., accountants or solicitors, where relevant)
- Technology, technical support, and administrative service providers

We may also disclose data to regulators (e.g., FCA), auditors, or authorities if required by law. We require all third parties to respect the security of your data and treat it lawfully. We do not sell your personal data.

International transfers

We select processors that store data within the UK or the European Economic Area (EEA). Processors operate under UK GDPR-compatible agreements with appropriate safeguards protect your data.

Data retention

We retain personal data only as long as necessary for the purposes set out in this policy, taking into account legal, regulatory, and business needs.

Given the nature of financial advice and the potential for long-term complaints (including through the Financial Ombudsman Service), we may retain client records **indefinitely**. You can request more details about retention for specific data types by contacting us.

Your data protection rights

Under UK data protection law, you have rights including:

- **Access** – to obtain a copy of your personal data
- **Rectification** – to correct inaccurate or incomplete data
- **Erasure** – to request deletion in certain circumstances
- **Restriction** – to limit processing in certain cases
- **Objection** – to processing based on legitimate interests or for direct marketing
- **Data portability** – to receive your data in a structured format (where applicable)
- **To withdraw consent** – where we rely on consent (note: we do not typically rely on consent for core services) To exercise your rights, please get in touch with us using the contact details on p.3 above. We will respond within one month. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk/concerns or by calling 0303 123 1113.

Marketing communications

We do not send general marketing communications. We may occasionally send existing clients service-related updates or information about additional relevant products/services, based on our legitimate interests. Prospective clients may receive limited communications (e.g., a newsletter) only where there is a legitimate interest, and you can object at any time.

Website and cookies

Our website uses only strictly necessary (essential) cookies required for basic functionality and security. We do not use analytics, advertising, or other non-essential cookies.

Data security

We implement appropriate technical and organisational measures to protect your data against unauthorised access, loss, or misuse.

Complaints and further information

If you have concerns about how we handle your personal data, please get in touch with us first (details in section 2) so we can try to resolve them. You can also complain directly to the ICO (details of which were provided on the previous page).

This policy may be updated from time to time. The latest version will be published on our website.