Business & Personal Investment Ltd
BPI House, Bourne End Business Park
Cores End Road, Bourne End
Bucks. SL8 5AS

Telephone: 01494 442700 / 01628 566234
E-mail: info@bpinvestment.com

Privacy notice

If you would like this document in larger print or in another format, please contact us.

We take your privacy seriously and are committed to handling your personal information lawfully, fairly and transparently under the UK GDPR and the Data Protection Act 2018.

This privacy notice explains how we collect, use, share, store and protect your personal information – including where we use artificial intelligence (AI) or automated tools.

This privacy notice also explains how you can make a complaint with us about how we handle your personal information.

Contact details

Please contact us if you have any questions about our privacy policy or information we hold about you; our contact details are as per our letterhead.

What personal information we collect

We will collect or use your personal information when you engage us for financial planning, financial advice, mortgage advice, insurance advice and investment management services.

This information may include:

- Personal identifiers – details that help us to confirm who you are, such as:
  - Your name, date of birth, address, contact details
  - National insurance number
  - Identification documents (passport, driving licence)
- Financial and professional information – Information that helps us understand your financial position including:
  - Your income and regular spending
  - Details of your assets, liabilities, pensions & investments
  - Tax information
  - Bank account details
  - Employment information
  - We may also need to use **special category information**, but only, where relevant and with your explicit consent. This could include:
    - Health information (for example, when providing insurance advice)
    - Racial or ethnic origin
    - Political opinions

- Religious or philosophical beliefs
- Trade union membership
- Genetic information
- Biometric information (where used to identify someone, such as for access or payment purposes)
- Sex life information
- Sexual orientation information

- Communications – to keep accurate records and meet regulatory requirements we may record:
  - Emails, notes of telephone call, meeting notes
  - Records required to meet the FCA's requirements

How we collect your personal information

We collect personal information from:

- Directly from you, including during meetings, telephone calls, emails, and other forms of communication.
- When you voluntarily provide information, such as completing client surveys or submitting feedback to us.
- Through your use of our website, where information is collected via cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We use this information to improve website functionality and to personalise repeat visits.

How we use your personal information

We use your personal information to help us deliver the services you've asked for. This may include:

- Understanding your financial situation so we can give you the right advice
- Providing recommendations that meet FCA rules on suitability
- Applying for or arranging financial products on your behalf
- Carrying out identity, fraud and anti-money-laundering checks
- Keeping accurate and compliant records
- Communicating with you about your services, plans, policies or investments
- Investigating and responding to complaints

Who we share your personal information with

To provide you with our services, we sometimes need to share your personal information with trusted third parties. These may include:

- **Financial product providers** such as insurers, investment platforms and pension providers
- **Compliance consultants, auditors and professional advisers** who help us meet regulatory requirements
- **Discretionary investment managers** where relevant to your service

- **IT service providers and secure cloud platforms** that support our systems
- **Regulators and authorities** such as the FCA, HMRC and the Financial Ombudsman Service and, where appropriate, to support fraud prevention or safeguarding
- **Credit reference agencies**, but only when necessary

Where third parties are involved in processing your data, we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

We **never** sell your personal information to anyone.

Using artificial intelligence (AI) to process your personal information

We do not use systems that make decisions about you without human involvement. Any outputs from automated tools or AI are reviewed by a human adviser before being used or relied on.

When we do:

Purpose of AI use

AI tools may be used for:

- Record and transcribe meetings and calls
- Generate meeting summaries & bullet point notes
- Improve data quality
- Draft or summarise internal documents

We do not use any systems for making automated decisions. All outputs and decisions made by AI are subject to human review and approval before being used or relied on.

Purpose and lawful basis for processing

The purpose of processing your personal information using AI is to support our internal processes and help us provide our services efficiently and accurately, with appropriate human oversight.

Our lawful basis for using AI to process your personal information is that it is necessary for the performance of our contract with you and for our legitimate interests in running our business effectively, as well as to meet legal and regulatory requirements where applicable.

Human review

Any AI assisted output is reviewed by a human adviser before being used or relied on.

Data sharing and storage

Where AI tools are used:

- Ensure only the minimum necessary personal information is processed.
- Anonymise or pseudonymise, where possible, personal information.
- Ensure processing occurs in secure, regulated systems.
- Signed data processing agreements with all suppliers to ensure personal information is protected and that they cannot use this to improve their own AI products.
- Ensure personal information is not transferred outside the UK/EEA without appropriate safeguards and consent being in place.

We **do not** use AI tools that use your personal information to train public models.

We do not use automated decision-making. If this changes, we'll update this notice.

Your data protection rights

You have several rights under data protection law. This helps you understand and control how your personal information is used.

- **Right to be informed** - You can ask us to explain how we collect, use, share, and store your personal information.
- **Right of access** - You can request a copy of the personal information we hold about you, along with details of how we use it.
- **Right to rectification** - If you think any of your information is wrong or incomplete, you can ask us to correct or update it.
- **Right to erasure** - In some situations, you can ask us to delete your personal information.
- **Right to restrict processing** - You can ask us to limit how we use your information in certain circumstances.
- **Right to object** - You can object to us using your personal information, for example for direct marketing.
- **Right to data portability -** You can ask us to send your personal information to you, or directly to another organisation, in a structured, commonly used electronic format.
- **Rights related to automated decision-making and profiling -** If a significant decision about you is ever made without meaningful human involvement, you have the right to request human review, ask for an explanation and challenge the decision.

We will respond to any request you make about your data protection rights within one month.

To make a request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for processing your personal information

UK data protection law requires us to have a valid legal reason—called a *'lawful basis'*—for collecting and using your personal information. The UK GDPR sets out the different lawful bases.

The lawful basis we rely on may affect which data protection rights apply to you. Below, we've listed your rights in brief.

You can read more about your data protection rights, including any exceptions, on the ICO's website: https://ico.org.uk/for-the-public/

We must have a valid legal reason (a 'lawful basis') for collecting and using your personal information. For the financial planning, financial advice, mortgage advice, insurance advice and investment management services we provide, we rely on the following lawful bases:

Contractual obligations

This is the main reason we use your personal information. We need certain details from you so we can deliver the services we've agreed to provide.

Legal obligations

Sometimes the law requires us to collect and use specific information. For example, UK anti-money-laundering laws require us to verify your identity.

Consent

In some situations, we may need your explicit consent to use special category information (listed below). We will always explain why we need this information and ask for your clear agreement before using it.

Special category information (used only when relevant and only with your explicit consent):

- Health information (e.g. for insurance advice)
- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic information
- Biometric information used for identification (e.g. access or payment systems)
- Sex life information
- Sexual orientation information

We also ask for your consent if you would like to receive updates about products or services that may interest you.

If we rely on your consent, you can withdraw it at any time.

Legitimate interests

We may keep certain personal information because we have a legitimate business reason to do so, for example, to check the suitability of our services, respond to any complaints in the future, or to meet the requirements of our Professional Indemnity insurer.

Recognised legitimate interest

In limited cases, we may rely on recognised legitimate interests for specific public-interest purposes, such as fraud prevention or safeguarding. This is narrowly defined and unlikely to apply to most of our routine services, but where used, we will ensure the processing is necessary and appropriate.

How long we keep your personal information

We keep the personal information we need to provide our services to you, and we take reasonable steps to make sure it stays accurate and up to date. Some information must be kept minimum periods set by our regulator, the Financial Conduct Authority (FCA):

- Investment business - 5 years
- Mortgage business - 3 years
- Pension transfers and opt-outs - kept indefinitely
- Insurance business - 3 years

We also have to keep certain records to meet UK anti-money laundering requirements. These include identity verification documents and other information used to confirm your identity.

- We will keep this information for at least 5 years after our relationship with you ends.
- Some records relating to transactions may be kept for longer where this is necessary to meet legal, regulatory or business requirements.

Because these are legal and regulatory requirements, we cannot delete your information before these minimum time periods have passed.

We may keep your personal information for longer if we have a legitimate business reason to do so, but we will not keep personal information for longer than necessary and will assess appropriate retention periods based on the purpose for which the information is held.

You can ask us to delete your personal information. We will do so unless we are required to keep it for legal or legitimate business reasons.

We regularly review the information we hold to ensure it is not kept for longer than necessary.

If you would like more information about how long we keep your personal information or how we decide this, please contact us.

Information about connected individuals

We may need to collect personal information about your close family members and dependents to provide our service(s) effectively. If this is the case, you are responsible for ensuring you have their consent to share this information with us.

If you act as a trustee or attorney, we may also need information about the relevant beneficiaries or donor(s).

We will give them a copy of this privacy notice or ask you to pass it on if that's more appropriate.

Using cookies

We use cookies to:

- Understand how visitors use our website
- Help us create reports and improve our site
- Where consent is not required, you can still control or opt out of cookies through your browser settings at any time.

If you'd like to learn more about cookies, you can visit: http://www.allaboutcookies.org/You can change your browser settings to block or delete cookies at any time. The website above explains how to do this. Please note that if you choose to block cookies, some parts of our website may not work as expected.

Marketing

We may contact you with information about our products and services.

If you've agreed to receive marketing from us, you can change your mind at any time. Just get in touch using the contact details at the top of this privacy notice.

Other websites

Our website may include links to other sites.

Please remember that this privacy notice only covers our website, so we recommend checking the privacy policies of any other sites you visit.

How to make a complaint

If you have any concerns about how we use your personal information, you have the right to raise a data protection complaint with us using the contact details at the top of this privacy notice. You do not need to follow a specific process or use particular wording.

You can raise a complaint through any of our usual contact channels, including email, telephone or post. We will:

- Acknowledge your complaint promptly and at least within 30 days of receiving it
- Investigate and respond without undue delay
- Keep you informed where appropriate

Further details of our complaints process are available on request.

If you are not satisfied with our response, you have the right to escalate your complaint to the Information Commissioner's Office (ICO).

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

Changes to our privacy policy

This privacy notice was last updated in August 2026.