

Privacy Policy

Introduction

This notice provides you with information concerning our collection and use of personal data. If you have any queries regarding this statement, please do not hesitate to contact us.

Legal basis

We collect, control and process your personal information because this is necessary to provide you with information, answer any queries you may have and for the provision of our services to you. Contractual necessity is therefore the lawful basis for collecting, controlling and processing your personal details and those of your employees and service providers other than sensitive personal data for which we require individual consent. We do not normally request or process any sensitive personal data.

Sensitive personal data:

- *Racial or ethnic origin*
- *Political opinions*
- *Religious or philosophical beliefs*
- *Trade union membership*
- *Genetic data*
- *Biometric data*
- *Data concerning health*
- *Data concerning sex life or sexual orientation*

We would discuss with you the need for the provision of sensitive data before you provide this information. The subsequent provision of sensitive personal data will be taken as consent to this processing.

It is entirely up to you as to whether or not you choose to provide us with any personal information. If you choose not to, we simply may not be able to assist you.

We do not use your personal data for marketing purposes nor will we share your data with any other organisation for marketing purposes.

What data we collect & what do we do with it

Working with us

We collect and use information about you, which will include personal data in order for us to advise you and make arrangements for you. In order to communicate with you about our services we will require your contact details including personal email addresses. Your name and email and information relating to the work we undertake for you will be processed and stored.

Sharing your data

In order to fulfill our obligations under any contract for services we will need to share your data with third party Data Controllers and Data Processors.

Pendulum Financial Management Limited

Data Controllers

This will include

- Insurance and mortgage product providers.
- Our compliance monitoring services.
- The Financial Conduct Authority.
- The Financial Ombudsman Service.
- Any other regulators where so required.

We also use external Data Processors that will hold information for the following purposes:

- Research
- Secure file sharing
- Data backup
- Communications
- Accounts
- Forecasting
- Record keeping
- Regulatory compliance

All external processors are only permitted to process your data in line with our instructions.

Data processors privacy

Below is a list of the processors used and the types of information processed. Please note that the Privacy & Security policies of the processors are aimed at the controllers who use them and may be updated.

Processor	Type of processing & data
Durell Software Limited	We store client information for communications and insurance contract arrangement within this processor's system.
Automattic Inc – Wordpress	This processor will hold IP addresses of people browsing our website.
Comodo CA Ltd	Providers of the SSL certification for our website.
Iress/Exweb	Insurance sourcing software, names and dates of birth are processed to review alternative insurance quotations.

In all cases we seek to minimize the amount of personal data shared and in some cases anonymise this. It is essential, however, that we can identify you quickly and easily so information shared may be identifiable as your personal data.

We will not share your personal information in any other circumstances than those necessary for the provision of service to you or where we are required to do so by law.

Where we store your Personal Data

All the data that we collect is stored on our local computer in the UK and with our listed processors under contract.

Pendulum Financial Management Limited

Marketing

The information we collect about you is used solely for the purposes for which it was provided. We will never use your data or share it for marketing purposes.

Your rights

Under data protection law you have the right to ask us for a copy of the information we hold about you, and to have any inaccuracies corrected or removed. You may also ask us to delete or cease processing all personal data held by us or any processor with which we have shared your data. We may not always be able to comply with a request for deletion, but you can ask us to cease processing your data.

In addition you have the right to be informed about the data we collect, where is located and with whom it is shared and the processing we undertake and to question any automated decision making processes

To do this, or if you require more information please either contact us in writing, by telephone or email.

Complaints

We are registered as a Data Controller in the UK with the Information Commissioner's Office. For more information: ico.org.uk.

Contact

For any queries about data protection please contact:

Contact name	Colin CLOY
Address	41 Worthing Road, Horsham, West Sussex RH12 1TD
Telephone	01403 270590
Web	Penulumfm.co.uk

IP Addresses and Cookies

Our website uses cookies purely to enhance your experience.

(A cookie is a piece of information that is stored on your computer's hard drive which records how you have used a website. This means that when you go back to that website, it can give you tailored options based on the information it has stored about your last visit.)

Vital cookies!

Ones that are essential to the operation of the website. These cookies enable a site to remember text entered in a page within the same session or to remember whether a user is logged in or not, the site cannot function without them.

Performance cookies

Performance cookies, which collect information about website usage to enhance the web experience. Examples of these include website analytics

Pendulum Financial Management Limited

(i.e. Google Analytics) and ad-response rates (where data is collected exclusively for calculating click-through rates). They don't collect information that can identify a particular visitor. These cookies are usually persistent and have fairly long expiry rates.

Functionality cookies

These remember the choices that users make within a web page, such as usernames, language or region to provide an enhanced, more personalised web experience. They cannot track your activity on other websites and are anonymous.

Advertising cookies

Targeting or advertising cookies collect information about your browsing habits to tailor third-party advertising to meet your interests. They are usually placed by advertisers with website operators' permission. We do not use this type of cookie.

Any changes we may make to our privacy policy in the future will be posted on our websites where appropriate or may be notified to you by post or e-mail.