

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 transparency 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.

Contact details

Please contact us if you have any questions about our privacy policy or personal information, we hold about you.

Telephone:	01555 678900
Email:	mail@ebsuk.com
In writing:	EBS House, 25 Hope Street, Lanark, ML11 7NE

What information do we collect about you?

We will collect or use your personal information when you engage with us for financial planning. This information may include personal, financial and professional information. It may also include special categories of personal data, for example regarding your health and religious beliefs, but only where relevant and with your explicit consent. We may also record any communication we have with you.

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.

How we will collect your personal information

We will collect information from you directly, during meetings (online and face to face), telephone calls, via email, or by other electronic means.

How will we use the information about you?

We collect information about you in order to provide you with the services for which you engage us.

Who might we share your information with?

To provide you with our services, we sometimes need to share your personal information with trusted third parties. These may include: IT service providers and secure platforms, professional compliance, accountancy or legal services, regulators and authorities as well as product, platform and investment providers that we may use to arrange financial services for you.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

Where it's necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit such as password protection or encryption of data.

We won't share or sell your information for marketing purposes to other companies.

Using artificial intelligence (AI) / automated tools to process your personal information

We may use AI tools to help us review information more efficiently and provide you with faster, more accurate services. The AI doesn't make decisions about you on its own – a human always checks the results.

AI tools may be used to draft or summarise documents (eg meeting notes). We do not use any systems for making automated decisions. All outputs made by AI are subject to human review and approval before being used or relied on.

Where AI tools are used, we will ensure processing occurs in secure, regulated systems, within the UK/EEA. We do not use AI tools that use your personal information to train public models.

Your data protection rights

You can read more about your data protection rights, including any exceptions, on the ICO's website: [For the public | ICO](#)

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.

Why do we need to collect and use your personal data?

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 and investment management services we provide, we rely on the following lawful bases:

We have a contractual obligation. 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.

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

We have a legitimate interest. 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.

We will obtain your consent. Depending on the services that you have agreed for us to provide, we may need to collect **special category data** from you regarding racial or ethnic origin, biometrics, political opinions, religious or philosophical beliefs, trade union membership and data concerning health. This will only be where relevant and with your explicit consent. We will always explain why we need this information and ask for your clear agreement before using it.

This information is required to:

- ◆ Assess your eligibility for specific products (for example, insurance or protection policies requiring information about health or medical history).
- ◆ Ensure our advice is tailored to your personal circumstances (for example, religious or philosophical beliefs for ethical investing).
- ◆ Meet our regulatory obligations to support vulnerable customers.

We only collect special category data that is necessary to deliver our services.

How long do we keep hold of your information?

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

We're also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- ◆ Five years for investment business
- ◆ Indefinitely for pension transfers and opt-out business
- ◆ Three years for insurance business

We also have to keep Identity verification documents (required under UK anti money laundering rules) for:

- ◆ At least 5 years after our relationship with you ends
- ◆ Up to 10 years if we still have an ongoing relationship

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

These are **minimum** periods, during which we have a legal obligation to retain your records. We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information, please email or write to us using the contact details noted below. When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/> You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

What can you do if you are unhappy with how your personal data is processed?

If you have any concerns about how we use your personal information, you can contact us using the details at the top of this privacy notice.

If you are not satisfied with our response, you can also complain to the ICO using the contact details below:

Telephone:	0303 123 1113 (local rate)
In writing:	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Website:	https://www.ico.org.uk/make-a-complaint

Last updated

This privacy policy was last updated on 24/06/2026.