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1 About us

Darcy Financial Planning Ltd is an Appointed Representative of and represents only St. James's Place Wealth Management plc (which is authorised and regulated by the Financial Conduct Authority) for the purpose of advising solely on the Group's wealth management products and services, more details of which are set out on the Group's website www.sjp.co.uk/products.

St. James's Place acts as principal to Darcy Financial Planning Ltd and ensures that any wealth management services that it provides to you are delivered in accordance with the applicable regulatory requirements. St. James's Place is also responsible for managing any complaints made by you in respect of the services we provide.

2 The Policy

This Privacy Policy explains when and why we collect your personal information and explains how we use your information.

To enable us to deal with any correspondence that may arise, we need to collect and process personal information. This makes us a "data controller".

We take the collection, usage and security of your personal data seriously. Under present law, we can only use your personal data if we have a good reason for doing so. The law provides examples of those reasons. These include:

- If you have given your consent.
- To perform or fulfil an agreement we have with you.
- If it is within our legitimate business interest.
- If we have a legal duty.
- If there is a public interest reason for doing so.

A legitimate interest is when we have a business reason to use your information. However, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

3 Accessing our website

Darcy Financial Planning Ltd processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than specified in this document. You are not required to provide any personal information to access our website.

4 Our collection and processing of your personal information

We may, however, collect and process the following data from you if:

- you subscribe to our regular updates for which we will collect your email address;
- you Request a Meeting, Make an Enquiry, or Request a Callback from the Contact page of our website, we will require your name, address, and either your email or telephone number. This information will only be used to contact you regarding your request and will not be stored for future use without your permission.
- you enquire about or apply to receive our wealth management services.
- you contact us by email, telephone and through other written and verbal communications for other reasons.
- You give us information contained in your business card.

We may also ask you for information when you report a problem with our website.

How long do we keep personal information?

Darcy Financial Planning Ltd takes your privacy extremely seriously. We will never disclose, sell or share your data without your consent, unless required to do so by law, and we only retain your data for as long as is necessary for the purposes specifically outlined in this document.

The purposes and reasons for processing your organisation's or your personal data are to enable us to communicate with you:

- effectively, while you are a client or subscriber to our regular features;
- to provide sector insights or information we believe will be of interest to you;
- enable us to operate our website efficiently and offer you an excellent user experience;
- enable us to effectively use Google Analytics and Mailchimp.

You receive our regular features after expressing an interest and consenting to receiving these bespoke articles. Darcy Financial Planning Ltd will only process your email address to send our regular features. Our features are designed to be entertaining and informative; they should not be construed as advice.

You are free to opt-out or object at any point in time by clicking the "unsubscribe" link in our feature email, or by contacting us.

Where you are an existing Darcy Financial Planning Ltd client

Darcy Financial Planning Ltd is an Appointed Representative of St. James's Place. It is their policy to retain personal information only for as long as needed to fulfil the purpose(s) for which it was collected, or otherwise as required under applicable laws and regulations. Under some circumstances they may anonymise your personal information so that it can no longer be associated with you. They reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you. Please see [St. James's Place's Privacy Policy](#) for further information on the processing of your personal information where you hold a St. James's Place product.

Where you are a prospective client

Darcy Financial Planning Ltd is an Appointed Representative of St. James's Place and as such, follow their mandatory guidance on collection and processing of information of your personal information. Please see [St. James's Place's Privacy Policy](#) for further information on:

- What personal information we may collect.
- What special categories of information we will collect.
- How we will we collect your personal information.
- What will we use your information for.
- Who may we share your personal information with.
- Where you are a family member, business associate or beneficiary of a client or prospective client, and your personal information will be used to provide our client or prospective client with a St. James's Place product or a quote.
- Other business partners of St. James's Place.

Who we share your data with

If you request a password reset, your IP address will be included in the reset email. Please see sections 3 'Accessing our website' and 4 'Our collection and processing of your personal information' of our Privacy Policy.

5 Marketing

Where you are a subscriber to our Community

Darcy Financial Planning Ltd uses the term 'Community' to describe its clients and subscribers to this website. We will never solicit business opportunities from anyone who subscribes to the '*Join our community*' section of our website.

Where you are an existing Darcy Financial Planning Ltd client

We may use your personal information to provide you with information about St. James's Place products or services which may be of interest, and where you have provided your consent for us to do so.

If you wish to opt out of marketing, you may do so by clicking on the "unsubscribe" link that appears in all emails sent by us, or by telling us when we call you. Otherwise, you can always contact us using the details set out in section 12 to update your contact preferences. Please note that, even if you opt out of receiving marketing messages, you may still receive communications from Darcy Financial Planning Ltd in connection with the products we offer you.

6 Automated decision making and profiling

Automated decision making refers to a situation where a decision is taken using personal information that is processed solely by automatic means. For example, using an algorithm or other computer software, rather than a decision that is made with some form of human involvement. We do not currently use automated decision making as all decisions are reviewed by an individual.

Profiling is any form of automated processing of personal information which evaluates certain personal aspects, for example, to assist in risk assessment and marketing activities. We do not currently use profiling on our website. For existing Darcy Financial Planning Ltd clients, please see sections 8 and 9 of [St. James's Place's Privacy Policy](#) for further information.

7 Your rights

You have several rights which you can exercise at any time relating to the personal information that we hold about you and use in the ways set out in this Policy. Please contact us at any time using the details set out in section 12 if you wish to exercise these rights; we will not usually charge you.

We respect your rights and will always consider and assess them but please be aware that there may be some instances where we cannot comply with a request that you make as the consequence might be that in doing so, we could not:

- comply with our own legal or regulatory requirements for example we are under obligations to hold records of our dealings with you for certain periods of time, or;
- provide services to you and would have to cancel your client agreement, for example we could not enter into investments on your behalf if we had deleted your personal information.

We will of course inform you if any of the above situations arise and if we are unable to comply with your request.

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it.

We are happy to provide you with such details but in the interests of confidentiality, we follow strict disclosure procedures which may mean that we will require proof of identify from you prior to disclosing such information.

We will usually provide your personal information to you in writing unless you request otherwise. Where your request has been made electronically (eg, by email), a copy of your personal information will be provided to you by electronic means where possible.

The right to rectification

Please help us to keep your personal information accurate and up to date. If you believe that there are any inaccuracies, discrepancies, or gaps in the information we hold about you, please contact us and ask us to update or amend it.

The right to restriction of processing

In certain circumstances, you have the right to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate, or where you think that we no longer need to use your personal information.

The right to withdraw your consent

Where we rely on your consent to process your personal information, you have the right to withdraw such consent to further use of your personal information.

The right to erasure/deletion

You are entitled to request your personal information to be deleted in certain circumstances such as where we no longer need your personal information for the purpose we originally collected it. When you exercise this right, we need to consider other factors such as our own regulatory obligation, to assess whether we can comply with your request.

The right to object to direct marketing

If you elect to receive our direct marketing, you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or by contacting us using the details set out in section 12. Please note that, as a client, even if you opt out of receiving marketing messages, we may still send you communications which are relevant to the nature of services we offer you.

The right to object to processing

In certain circumstances, where we only process your personal data because we have a legitimate business need to do so, you have the right to object to our processing of your personal data.

The right to data portability

In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.

When you exercise this right, we need to consider other factors such as our own regulatory obligations, to assess whether we can comply with your request.

Rights relating to automated decision-making

We do not currently use automated decision making as any decisions required are reviewed by an individual. For existing Darcy Financial Planning Ltd clients, please see sections 8 and 9 of [St. James's Place's Privacy Policy](#) for further information.

The right to make a complaint with the ICO

If you believe that we have breached data protection laws when using your personal information, you have a right to complain to the Information Commissioner's Office (ICO). You can visit the ICO's website at <https://ico.org.uk/> for more information. Please note that lodging a complaint will not affect any other legal rights or remedies that you have.

8 Cookies

Cookies are small text files downloaded to your device by the websites you visit. They are designed make the interaction between you and a website faster and easier, by assisting navigation between pages and storing your preferences. They also help us to monitor how visitors use our site and allow us to maintain the optimum experience for website users.

We only use two cookies on the website at present:

cookieyes-consent This is placed to record your response to the cookie consent box. This cookie will expire after one year.

_lscache_vary This cookie is used to store whether you are logged into the site and what your user role is. It is used to help improve site performance for logged in users. This cookie will expire after two days.

Cookies may be set by the website you are visiting (local cookies) or they may be set by other websites who run content on the page you are viewing (third-party cookies). Our website does not store or capture personal information about you when you visit it, it

merely records traffic information. This means information about all our visitors collectively, for example the number of visits the website receives. To respect our visitors' rights of privacy, this information is anonymous, and no individual visitor can be identified from it.

You can disable and delete cookies by changing the appropriate setting within your browser's 'Help', 'Tools' or 'Settings' menu. Please note that by disabling cookies you may not benefit from some of the features of our site. You can find out more about deleting or controlling cookies by visiting aboutcookies.org.

9 Data Protection

We use Amazon Web Services (AWS) for data protection within Amazon Simple Email Service for email routing. AWS is responsible for protecting the global infrastructure that runs all the AWS Cloud. Our website is built using WordPress, a software content management system (CMS), which places a cookie purely for logging in and saving your preferences. We also utilise Google Analytics cookies, which are enabled to pull through data for anonymised analysis (please refer to paragraph two above). LiteSpeed, our server, places a cookie for caching purposes and another when you agree to cookies; this then automatically saves your preferences.

Secure Containment

Each account on our Shared, Dedicated, and Reseller Hosting is isolated from others. This means that there is no access to unauthorized files outside of the specific account, enhancing overall security.

Automatic Security Updates

Dynamic live patching of the Linux Kernel allows us to apply security updates without the need for reboots. This not only boosts uptime but also minimizes exposure to potential security threats.

ISO 27001 Data Centres

Our services are hosted in ISO 27001-certified data centres, manned 24/7 by dedicated security personnel and technicians. This ensures a heightened level of protection for your data.

Web Application Firewalls (WAF) and Perimeter DDOS Protection

Our infrastructure is fortified with web application firewalls that are always active, providing an application-specific security shield. Additionally, perimeter DDOS protection is standard, safeguarding against distributed denial-of-service attacks.

How do we protect your information?

Darcy Financial Services Ltd takes its responsibility to look after your personal information and privacy seriously and have a number of security measures in place to help prevent fraud

and cybercrime. GURU enhanced security and control, is powered by CloudLinux, a hosting-focused commercial Linux distribution. GURU systems deliver increased stability, usability, speed, control and most importantly, security.

Embedded content from other websites

Articles on this site may include embedded content (for example: videos, images, articles, etc). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website and therefore the third-party website's respective Privacy Policy applies.

These third-party websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Where you are an existing or prospective Darcy Financial Planning Ltd client, how does St James's Place keep your information safe?

St. James's Place takes their responsibility to look after your personal information and privacy seriously. In today's world, we have all seen a growing trend in cybercrime and security breaches and have a number of security measures in place to help prevent fraud and cybercrime.

If St. James's Place become aware that a personal data breach has occurred and is likely to result in a high risk to the rights and freedoms of Darcy Financial Planning, our clients, or employees, they will inform us without undue delay. Please see [St. James's Place's Privacy Policy](#) for further information.

10 Google Analytics

Our site use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

Darcy Financial Planning Ltd will only collect personal information about you if you send us an e-mail enquiry via the 'contact us' facility. For this to happen, you will need to fill out the online 'contact us' form or complete the registration details. The type of information being collected for an enquiry will be apparent from the layout of the 'contact us' form, which also tells you how this information will be used. For existing Darcy Financial Planning Ltd clients, please see section 13 'Google Analytics' of [St. James's Place's Privacy Policy](#) for further information.

11 Monitoring

Please note that if you communicate with us electronically, including by e-mail, telephone or fax, this communication may be randomly monitored and/or recorded to protect the interests of our business and our clients. Please see [St. James's Place's Privacy Policy](#) for information on their monitoring policies and procedures.

12 Hyperlinks

We may provide hyperlinks from our website to websites of other organisations including websites of associated companies. Please note that this Privacy Policy applies only to this website and that Darcy Financial Planning Ltd and St. James's Place will not be liable for the contents of linked websites or any transactions carried out with organisations operating those websites.

13 Contacting Us

If you would like any further information about any of the matters in this Policy or if you have any other questions about how we collect, store or use your personal information, you may contact our Data Protection Officer at Darcy Financial Planning Ltd, 22 George Booth Grove, Nantwich, Cheshire, CW5 6ZF.

If you would like any further information about any of the matters in this Policy or if you have any other questions about how St James's Place collect, store or use your personal information, you may contact St. James's Place Data Protection Officer at St. James's Place plc, St. James's Place House, 1 Tetbury Road, Cirencester, Gloucestershire, GL7 1FP, United Kingdom, dpo@sjp.co.uk and 01285 878453.

14 Updates to this Policy

We may occasionally need to make changes to this Policy, for example, as the result of changes to law, technologies, other developments or new products and services being offered.

We will provide you with the most up-to-date Policy and you can check our website periodically to view it or you can request a copy from our Data Controller.

15 WordPress Privacy Policy

Website Visitors

Like most website operators, WordPress.org collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. WordPress.org's purpose in collecting non-personally identifying information is to better understand how WordPress.org's visitors use its website. From time to time, WordPress.org may release non-personally-identifying information in the aggregate, eg, by publishing a report on trends in the usage of its website.

WordPress.org also collects potentially personally-identifying information like Internet Protocol (IP) addresses. WordPress.org does not use IP addresses to identify its visitors, however, and does not disclose such information, other than under the same circumstances that it uses and discloses personally-identifying information.

The WordPress cookie only applies to Darcy Financial Planning's administrators.

Embedded content from other websites

Articles on this website may include embedded content (for example: videos, images, articles, etc). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website and therefore the respective Privacy Policy applies.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. [For full information, please refer to the WordPress Policy here.](#)

Our Privacy Policy was last updated on 09/12/2023.