

Privacy notice

Stellar Asset Management Limited customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Post

20 Chapel Street, Liverpool, L3 9AG, GB

Telephone

020 3195 3500

Email

enquiries@stellar-am.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Gender
- Pronoun preferences
- Occupation
- Date of birth
- Marital status
- Third party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Employment details (including salary, sick pay and length of service)
- Credit history and credit reference information
- Health information (such as medical records or health conditions)
- Criminal records data (including driving or other convictions)
- Information relating to compliments or complaints
- Video recordings
- Audio recordings (e.g. calls)
- Records of meetings and decisions

- Account access information
- Website user information

We also collect or use the following information to **provide and improve products and services for clients:**

- Health information

We collect or use the following personal information for the **operation of client or customer accounts:**

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences
- Technical data, including information about browser and operating systems

We also collect or use the following information for the **operation of client or customer accounts:**

- Health information

We collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes:**

- Names and contact information
- Client accounts and records
- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas

- Audio recordings of private or staff only areas
- Call recordings
- Financial information e.g. for fraud prevention or detection
- Location data

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Purchase or client account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information

- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations
- Criminal offence data

We also collect or use the following information to **comply with legal requirements**:

- Health information

We collect or use the following personal information to **protect client welfare**:

- Names and contact information
- Client account information
- Health and wellbeing information
- Emergency contact details

We also collect or use the following information to **protect client welfare**:

- Health information

We collect or use the following personal information for **recruitment purposes**:

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)

- Education history (e.g. qualifications)
- Right to work information
- Details of any criminal convictions (e.g. Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Security clearance details (e.g. basic checks and higher security clearance)

We also collect or use the following information for **recruitment purposes**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Health information
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas
- Audio recordings of private or staff only areas
- Call recordings

- Witness statements and contact details
- Photographs
- Relevant information from previous investigations
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence
- Location data

We also collect or use the following information for **dealing with queries, complaints or claims**:

- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)

- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

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

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- To enable the development of our products and services and what we charge for them
- To define relevant clients for new products and services to achieve good outcomes for our clients
- To ensure that we are able to meet our legal and contractual obligations effectively and efficiently
- To comply with regulatory requirements

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To ensure that we are able to meet our contractual obligations effectively and efficiently

- To comply with regulatory requirements

Our lawful bases for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To ensure that we are able to meet our contractual obligations effectively and efficiently
 - To comply with regulatory requirements
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection

rights may apply, except the right to portability. Our legitimate interests are:

- To work out which products and services might interest you and sharing our industry insights
- To keep our records up to date and honouring your communication preferences

Our lawful bases for collecting or using personal information for **research or archiving purposes**:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To develop new products and services to achieve good outcomes for our clients

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **protect client welfare** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To develop and improve our recruitment process

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we are collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To ensure we deliver good outcomes for clients

Where we get personal information from

- Directly from you
- Regulatory authorities
- Legal bodies or professionals (such as courts or solicitors)
- Debt collection agencies
- Publicly available sources
- Previous employment
- Market research organisations
- Credit reference agencies

- Suppliers and service providers
- Third parties:
 - Financial Advisers

How long we keep information

Data in respect of clients will be retained for five years after the account was closed.

Data in respect of employment matters will be retained for three years.

Who we share information with

Others we share personal information with

- Other financial or fraud investigation authorities
- Professional or legal advisers
- Regulatory authorities
- External auditors
- Organisations we are legally obliged to share personal information with
- Suppliers and service providers

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the 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>

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