

Privacy Notice

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We recommend that you read this Privacy Notice in full to ensure you are fully informed about your personal data.

If you would like this document in a larger text size, please let us know. If your PDF viewer has this icon, clicking it will enable you to receive this wording in audio format 

1. The purpose of this Privacy Notice and what we do

We (the Perspective group of companies) respect your right to privacy. This notice applies to clients of the Perspective group (listed below) and users of our websites and client portals (our "Websites"). It explains who we are, and how the Perspective group of companies collects, shares and uses personal data about you and how you can exercise your privacy rights.

Your local Perspective Office, and their trading styles, is part of a leading national group of authorised financial advisory firms that are supported by the Perspective Financial Group Limited.

Perspective Financial Group consists of Perspective Financial Group Limited as well as the local offices listed on our site (<https://www.pfgl.co.uk/our-locations/>). When we mention "Perspective", "we", "us", "our" we are referring one or all entities of the Perspective Financial Group.

The data controller of your data (the party responsible for the use and protection of your data) is Perspective Financial Group Limited (PFGL) and your local Perspective office. We act as joint data controllers.

If you have any questions or concerns about the use of your personal data, then please contact us using the contact details provided in the 'How to contact us' section heading below.

2. Personal information we collect and process

The personal data we collect from you, either directly or indirectly, will depend on how you interact with us and with our Websites. We collect personal data about you from the following different sources:

Information that you provide directly: We may ask you to provide personal data on Websites, by filling in hard copy forms and documents or by corresponding with us by phone, e-mail, letter or otherwise or during the course of meetings which you attend with one of our advisers.

Information that we collect indirectly: We collect your personal data indirectly, including through automated means from your device when you use our Websites. Some of the information we collect indirectly is captured using cookies and other tracking technologies, as explained further in the "Cookies and similar tracking technology" section below.

Information from third parties: We also collect your personal data from third party sources. For example:

- from our service providers that provide verification services, tracing services, operational assistance, lead generation, email, marketing and analytics services, and financial and credit related services (including from providers of products we recommend)
- under introducer and referral arrangements, for example where your professional advisers (which may include accountants, solicitors, estate agents, will writers, ex-vendors etc.) introduce you to us. Sometimes our existing clients also make referrals to us

Information received from third parties will be checked to ensure that the third party either has your consent or are otherwise legally permitted or required to disclose your personal data to us.

Information from electronic recording applications: We use a specialist application that acts as an electronic notetaker of client meetings. The application records meetings then utilises artificial intelligence (AI) to convert the items discussed into outputs to support our client journey and client service requirements. The information captured is solely for this purpose, is securely stored at all times and is retained for no longer than required for the stated purpose.

Information from mergers and acquisitions: We also receive information as part of exploratory and successful mergers and acquisitions process. For example:

- from potential targets for mergers and acquisitions to carry out due diligence checks. Information in these instances is processed in a secure and separate data repository. The processing is to investigate and verify information about the target company, assets, client portfolio and to assess the regulatory risk. The information relating to mergers and acquisition targets that are not progressed is only retained for the duration of the assessment period.
- from successful mergers and acquisitions where the information is amalgamated into our client systems.

The personal data that we ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information	Source
Identity and Contact Information such as your first, middle, last and maiden name, title, gender, nationality, date of birth, place of birth, email address, telephone number, postal address and country of residence. If you register using our client portal we will also collect your login information (email and password). We may ask for copies of identity documents in which case we may collect details including your place of birth and residential address.	Directly from you (online or offline) Indirectly from you Third parties
Payment Information such as payment method, bank account details, transaction statements, your billing address, payments and, and other services supplied to you.	Directly from you (online or offline) Indirectly from you Third parties
Financial Information relating to you, including national insurance number, tax code, pension contributions and current value, salary, bank or investment account details, bank or investment account balances, details of investments, will granted/not granted, and power of attorney details.	Directly from you (online or offline); Third parties (with your authorisation)
Dependants Information details of your dependents such as their name, date of birth and future aspirations. If you register using our client portal we will also collect your login information (email and password). We may ask for copies of identity documents in which case we may collect details including your place of birth and residential address.	Directly from you
Lifestyle Information such as your marital status, year of marriage/divorce/bereavement, smoking/non-smoker, social, ethical, environmental or religious considerations you have asked to be taken into account, job title, investment goals and choices and your attitude to risk.	Directly from you

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Types of personal information	Source
Health Information about you or your dependants.	Directly from you For dependants, from your relative (our client)
Communications Information such as contact we have had with you (including referrals and quotes), services received, your customer experience, details relating to complaints and incidents, and any other feedback you provide to us.	Directly from you Third parties (with your authorisation)
Recordings of calls we make or receive, and recording of other communications, each for training and quality purposes and to comply with our legal and regulatory obligations. For more information, please see the 'When we record communications' section below.	Indirectly from you
Advertising and Marketing Information such as your interests based on your use of our offline and online services, survey responses, promotions you enter, preferences in relation to receiving marketing materials from us, communication preferences, your preferences for particular products or services.	Directly from you (online or offline) Indirectly from you Third parties
Device Information collected from (or as a result of your using) your device (including by means of cookies and similar tracking technology), including your IP address, your ISP, and the browser you use to visit our Websites, device type, unique device identification numbers or other identifiers.	Indirectly from you
Website Usage Information such as activity on and interaction with our Websites, information that we capture using cookies and similar technologies (see the "Cookies and similar tracking technology" section below). This will include page views and searches, log-in information, clicks, operating system, information about content viewed, or downloaded, length of visits to certain pages, length of Website use, and other functional information on Website performance (for example, application version information, diagnostics, and crash logs).	Indirectly from you
Uploaded Content such as any personal data in documents that you upload onto our Websites (e.g. for transmission to a provider).	Directly from you

As detailed above, we may obtain some information about you from third party sources, but only where we have checked that these third parties are legally permitted or required to disclose your personal data to us. In particular, once you have provided your consent for us to act on your behalf, we will send a Letter of Authority signed by you to the providers with whom you hold pensions and/or investments so that we can obtain relevant details and advise you as required. This will help us make the best possible assessment of your financial situation.

3. Sensitive personal information

Some of the information we will collect under section 2 is classed as 'Special Category Data' (which is also known as "sensitive personal information") and to help you understand what Special Category Data is, we have detailed this below along with an explanation of why we collect it:

Types of special category personal information ("Special Category Data")	Why we collect it
Health Information relating to your physical or mental health.	Certain products and services that you request may require this information. Specifically, in order for us to advise you on and to submit applications for health or life insurance products or annuities and services, we will need to collect information relating to your physical and mental health in order to obtain accurate quotes and to advise on the suitability of products (as insurance premiums and eligibility for products will in part depend on your physical and mental health). We will usually collect this information in the course of meetings with you, on specific questionnaires or in the process of completing an application form for such products and services.
Dependants' Health Information relating to your dependants' physical or mental health.	Where you are responsible for a dependant's care, assessing our advice against any financial responsibilities.
Other Special Category Data which you ask that we take into account (e.g. ethical, or religious considerations)	To tailor our services and products recommended in line with particular social, ethical, environmental and/or religious considerations you have asked we take into account. <i>Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, and trade union membership constitutes special category data and is afforded special protection under data protection law.</i>

We will only process the sensitive personal data listed above with your explicit consent. We ask for your consent to the processing of this data on our Consent Form within the Client Agreement. You may choose not to provide us with this consent. However, please note that if you do not provide us with your consent to collect and process the information:

- we may not be able to advise you fully in respect of certain products and services which require this information (in particular those relating to health or life insurance or annuities);
- your application may be rejected by the providers of products and services which require this information; or
- the quotes for such products and services may be higher than would be the case if this information were provided

4. How we use your personal information (our purposes) and our legal basis for processing

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** – we require certain personal data in order to provide the services you request from us;

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- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate interests** – we will use or disclose your personal data for our legitimate interests or those of a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business and services, including our Websites; to communicate with you and respond to your questions; to improve our Websites or use insights to improve or develop marketing activities and promote our products and services; detect or prevent illegal activities (for example, fraud); to manage the security of our IT infrastructure, and the safety and security of our employees, clients, vendors and visitors. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our business and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are; or
- **Legal obligation** – there will be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you or with your explicit consent, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data).

The tables below in Annex B provide more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

5. When we record communications

We, and persons acting on our behalf, may record and/or monitor communications (including telephone conversations over landlines and mobile phones, emails, instant messaging, chat rooms, fax and other electronic communications) between our staff and you. We record communications between us in order to comply with our legal and regulatory requirements – as a regulated financial adviser, the law requires us to record these communications. We also use the recordings to keep a record of our advice and for training and quality purposes.

6. Who might my personal information be shared with?

We share your personal data to the following categories of recipients:

- to **another Perspective Financial Group Office or our affiliate to Cambridge Investments** where that area of the wider business is better-placed to provide you with advice (for example where that other entity specialises in an area in which you are interested).
- to **Perspective Financial Group Limited**, which is the joint controller of your data and provides local offices with support (including accountancy and compliance support), and shared back-office services;
- to **providers of products and services** in respect of whom you request us to submit applications on your behalf and to receive updates from such providers in order for us to provide our services to you throughout the lifetime of our relationship with you;
- to our **suppliers and partners** in order for them to help us provide our services to you for example providers of:
 - Compliance services including ID verification services, business quality checking software, regulatory compliance support, legal support, and audit services.
 - Our IT service providers, and their sub-contractors, who act only on our instructions. The IT services provide back-office systems and paperless office systems to assist us with delivering you with an efficient, modern and professional service.
 - Using providers that implement artificial intelligence (AI) to facilitate data processing, records management, and to convert information we receive or record from you to update your file, produce reports, annual reviews and other reasonable tasks that aid our client delivery service.
 - Client portal, investment platform partner, and other related client facing applications that enhance the delivery of our services to clients.
 - and with other suppliers and partners who otherwise process personal data for the purposes described in this Privacy Notice.
- to **introducers or joint venture companies, where Perspective are one of the joint owners**, we may share updates regarding the status of your application and/or the progress of the services provided. This would be to enable the introducer or joint venture to carry out any necessary revenue reconciliation in relation to fees and/or commissions (if applicable).
- to a **prospective buyer** (and its agents and advisers) in the event that Perspective Financial Group Limited intends to sell any part of its business or its assets or if substantially all of its assets are acquired by a third party, in which case your personal data could form part of one of the assets sold, provided that the buyer is informed that it must use your personal data only for the purposes described in this Privacy Notice – neither will we ever rent or sell your personal data other than as part of a business sale;
- to any **national and/or international regulatory, enforcement body, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation (including where we are required by law to provide information to organisations such as HMRC), (ii) to exercise, establish or defend our legal rights or so a third party can defend theirs, or (iii) to protect your vital interests of those of any other person; and
- to **any other person with your consent** to the disclosure or where the law requires or permits us to do so.

7. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal data about you, including to serve interest based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

8. How we keep your personal information secure

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures are designed to provide a level of security appropriate to the risk of processing. Specific measures we use include encrypting your personal data in transit and at rest; using an industry standard framework as part of our Information Security programme; employing advance malware protections; implementation of other reasonable security defences (including vulnerability management, access management, multi-factor authentication, training and recovery/resilience measures). Where you have created an account with us that uses a unique password to enable you to access our Websites, it is your responsibility to keep this password secure and confidential.

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9. International data transfers

We process personal data inside the UK, and do not ordinarily transfer your personal data internationally.

To the extent we decide to transfer your personal data outside the UK in the future, for example to suppliers, partners, future group entities, providers of products and services, we will ensure these transfers are made in compliance with applicable data protection laws. In that scenario we would rely on available UK GDPR adequacy decisions (data bridges) or entry into standard contractual clauses to protect the data transferred.

10. Your data protection rights

Individuals located in the UK and EEA have the following data protection rights. To exercise any of them see specific instructions below or contact us using the contact details provided under the "How to contact us" heading below.

- (a) You may **access, correct, update or request deletion** of your personal data.
- (b) You can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data (i.e. your data to be transferred in a readable and standardised format).
- (c) You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below. If you choose to opt out of marketing communications, we will still send you non-promotional emails, such as emails about your account or our ongoing business relations.
- (d) If we have collected and process your personal data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- (e) You have the right to make a complaint to the data controller if you feel there is an infringement of UK GDPR or DPA 2018. We will acknowledge receipt of your complaint within 30 days and respond without undue delay.

If following our response to your complaint relating to UK GDPR you remain dissatisfied, then you have the right to contact the Information Commissioner's Office (ICO). For more information, see the ICO's website <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/>.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

11. Data retention

We retain personal data we collect from you where we have an ongoing regulatory requirement or legitimate need to do so, for example:

- (a) to provide you with a product or service you have requested us to provide,
- (b) to perform our contractual obligations to you;
- (c) to comply with applicable legal, tax or accounting requirements;
- (d) to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, regulatory authority or ombudsman.

12. Updates to this Privacy Notice

We may change or update this Privacy Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

13. How to contact us

If you would like to contact us in relation to this Privacy Notice or if you have any other questions in respect of our processing of your personal data, please contact our Data Protection Officer using the following details: by email at dpo@pfgl.co.uk or by post to Perspective Financial Group Ltd, Lancaster House, Ackhurst Business Park, Foxhole Road, Chorley, Lancashire, PR7 1NY. Alternatively, a list of our local offices including their contact details is available on our website at <https://www.pfgl.co.uk/our-locations/>. You can also request a copy of this list using the contact details in this section.

Annex B

Purpose/Activity	Type of personal information data	Lawful basis for processing including basis of legitimate interest
<p>Carry out money laundering, know your client, sanctions and financial checks in accordance with our legal and/or regulatory obligations, and for fraud and crime prevention and detection purposes.</p> <p>We may ask for copies of identity documents. We will only ever use copies of identity documents for this purpose.</p> <p>We carry out onboarding and ongoing checks.</p>	<p>Identity and Contact Information</p> <p>Dependants Information (which for the purposes of our know your clients checks may include broader family information)</p> <p>Financial Information</p>	<p>Legal obligation. All advice is provided by our group offices which are authorised and regulated by the Financial Conduct Authority. As regulated entities we are required to carry out these checks.</p>
<p>Evaluate your eligibility for products.</p> <p>Enable us to advise you on your financial circumstances and the appropriateness of specific courses of action and products.</p> <p>Enable us to provide you with services that you have requested that would involve, or have an impact on, your dependents (who may be adults or minors). Where those dependents are adults, please make sure that you have their permission to provide us with their personal information.</p>	<p>Financial Information</p> <p>Lifestyle Information</p> <p>Dependants Information (including health information)</p> <p>Health Information</p> <p>Other Special Category Data</p>	<p>Performance of a contract with you.</p> <p>Legitimate interests to assess your suitability for products and services you have requested.</p> <p>Consent (in the case of processing of special category data).</p>
<p>Manage, administer and provide our services to you including to discuss products or services for which you apply or may be interested in applying for, to manage any applications you make for products or services, to respond to any correspondence and service-related enquiries you send to us in respect of our services, to communicate any updates to you including any changes to our services, the terms and conditions of any services which we have provided to you, any changes to this Privacy Notice and to our Websites.</p>	<p>Identity and Contact Information</p> <p>Financial Information</p> <p>Lifestyle Information</p> <p>Health Information</p> <p>Dependants Information (including health information)</p> <p>Other Special Category Data</p> <p>Communications Information</p> <p>Payment Information</p> <p>Recordings</p>	<p>Performance of a contract with you.</p> <p>Consent (in the case of processing of special category data).</p> <p>Legal obligation (to assess the suitability of products)</p> <p>Legitimate interests to assess your suitability for products and services you have requested.</p>
<p>Enable us to provide you with personalised and accurate advice and to make recommendations that are suitable for your circumstances. For example, by taking into account your marital status, job title, investment goals and choices and your attitude to risk.</p>	<p>Lifestyle Information</p> <p>Financial Information</p> <p>Health Information</p> <p>Other Special Category Data</p> <p>Dependants Information (including health information)</p>	<p>Performance of a contract with you.</p> <p>Legitimate interests to assess your suitability for services you have requested.</p> <p>Consent (in the case of processing of special category data).</p>
<p>To enable us to provide you with services that you have requested that would involve, or have an impact on, your dependents (who may be adults or minors).</p> <p>Where those dependents are adults, please make sure that you have their permission to provide us with their personal information.</p>	<p>Lifestyle Information</p> <p>Financial Information</p> <p>Health Information</p> <p>Other Special Category Data</p> <p>Dependants Information (including health information)</p>	<p>Performance of a contract with you.</p> <p>Legitimate interests to assess your suitability for services you have requested.</p> <p>Consent (in the case of processing of special category data).</p>
<p>Keep a record of our calls and online interactions in accordance with our regulatory obligations</p> <p>For more information, please see the 'When we record communications' section below.</p>	<p>Identity and Contact Information</p> <p>Recordings</p> <p>(together with any information you may provide over the phone for example see row 4 of this table)</p>	<p>Legal obligation (to keep a record of financial advice given);</p> <p>Legitimate interest – to keep a record of our advice and for training and quality purposes.</p>
<p>Reviewing communications with you for customer support and quality assurance and training purposes, and related record keeping.</p>	<p>Identity and Contact Information</p> <p>Payment Information</p> <p>Communications Information</p> <p>Device Information</p> <p>Website Usage Information</p> <p>Advertising and Marketing Information</p> <p>Recordings</p>	<p>Necessary for our legitimate interests (to operate, provide and improve our business; to communicate with you) – where our communications are not necessary to perform or enter into a contract with you.</p>

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Purpose/Activity	Type of personal information data	Lawful basis for processing including basis of legitimate interest
Keep our business, including our Websites, offices and our employees, clients, vendors, and visitors secure and address threats to their safety or the safety of others; to detect and prevent fraud (online and in store). For example, online we use malware and spyware monitoring tools to detect suspicious activity and algorithms to detect unauthorised access.	Identity and Contact Information Device Information Website Usage Information Communications Information	Necessary for our and our third parties' legitimate interests (to operate and provide our business, including our Websites; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure, and the safety and security of our employees, clients, vendors, and visitors). The substantial public interest to prevent or detect unlawful acts (where we suspect fraud) The substantial public interest to comply with regulatory requirements relating to unlawful acts and dishonesty.
Administer and maintain our Websites and our IT systems (including monitoring, troubleshooting, data analysis, testing, system maintenance, repair and support, reporting and hosting of data).	Identity and Contact Information Device Information Website Usage Information	Our and our third parties' legitimate interests (to operate, provide and improve our business, including our Websites; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure).
Manage our use of tracking technologies such as cookies (including enabling you to manage your cookie preferences) and analyse collected data to learn about our Websites and campaigns, and to improve them. To develop new services. This includes website analytics, marketing analytics, and identifying browsing trends and patterns	Device Information Website Usage Information Advertising and Marketing Information Communications Information	Consent (where required under applicable law – see cookie consent tool on our website). Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our business, including our Websites, to improve our Websites or use the insights to improve or develop marketing activities and promote our products and services.
Contact you in order to receive your feedback on our services and to participate in related surveys. Contact you about our products and services, promotions, events we think may be of interest, including our newsletter and other promotional mailers and electronic communications. Review your feedback and experience with us so that we can improve our products and services for you and for our other clients.	Identity and Contact Information Website Usage Information Advertising and Marketing Information Communications Information Recordings	Consent (where required under applicable law). Otherwise our legitimate interests (to operate, provide and improve our business; to communicate with you and to develop marketing activities and promote our products and services).
Personalise, target, and deliver advertising for our services on third party websites, apps, and other online services (including to identify audiences and individuals like you to better tailor our marketing campaigns and communications), and measure the effectiveness of our campaigns and adjust our methods.	Identity and Contact Information Advertising and Marketing Information Website Usage Information Device Information	Consent (where required under applicable law). Otherwise our legitimate interests (to improve our business, to promote our services and to use the insights to improve or develop our marketing activities).
Comply with legal and regulatory obligations to which we are subject, including our obligations to respond to your requests under data protection law.	All of the information described above	Legal and regulatory obligations (our regulators require us to hold records of our dealings with you)
Protect our legal rights (for example to take professional advice and to defend or exercise legal claims) Disclose your personal data to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a Court Order, regulatory authority or any other third party with the lawful right to request and receive the personal data we hold about you (including law enforcement agencies and tax authorities).	All of the information described above	Our legitimate interests to protect our business interests. Legal and regulatory obligations.