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# **INDEPENDENT WEALTH MANAGEMENT CONSULTANTS LTD**

# PRIVACY NOTICE

*This privacy notice explains how Independent Wealth Management Consultants Limited use any personal information we collect about you*.

## What information do we collect about you?

To provide our services properly we will need to collect information about your personal and financial circumstances. We take your privacy seriously and will only use your personal information to deliver our services.

Processing of your personal data is necessary for the performance of our contract for services with you. Generally, this is the lawful basis on which we intend to rely for the processing of your data. (Please see the reference to special categories of data below). Our policy is to gather and process only that personal data which is necessary for us to conduct our services appropriately with you.

We collect information about you when you engage us for investment advice and management services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

## Information about connected individuals

We may need to gather personal information about your close family members and dependants to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

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

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data, we would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required, we will obtain your explicit consent in order to collect and process this information.

## 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?

***If you agree***, we may email you about other products or services that we think may be of interest to you.

We will not share your information for marketing purposes with other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they’ll only act in accordance with our written instructions.

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 which will include password protection of the data during transfer and/or encryption of data.

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.

## Special Categories of Personal Data

There are certain categories of personal data that are sensitive by nature. The categories include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health. Depending on the nature of the products and services that you engage us for we may need to obtain your sensitive personal data particularly in relation to health. Our policy is that should we require any special category of personal data we will only gather this with your explicit consent.

How long do we keep hold of your information?

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

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

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

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 is in our legitimate interests to do so. In any case we will not keep your personal data for longer than 20 years after our relationship with you has ended.

You have the right to request deletion of your personal data. We will 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 would 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.

## Marketing

We may like to send you information about our products and services which may be of interest to you. If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

## 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?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113 (local rate)

## Changes to our privacy policy

We keep our privacy policy under regular review and we will advise you of any changes when they occur. This privacy policy was last updated on 02/01/2019.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at reception@b-independent.co.uk.

Or write to us at Independent Wealth Management Consultants Ltd, 27 Grove Street, Retford, Nottinghamshire, DN22 6JP.

## What happens next?

By signing an agreement to proceed with our advices you consent to us ***or any company associated with us*** processing, both manually and by electronic means, your personal data for the purposes of providing advice, administration and management as outlined within this privacy agreement.